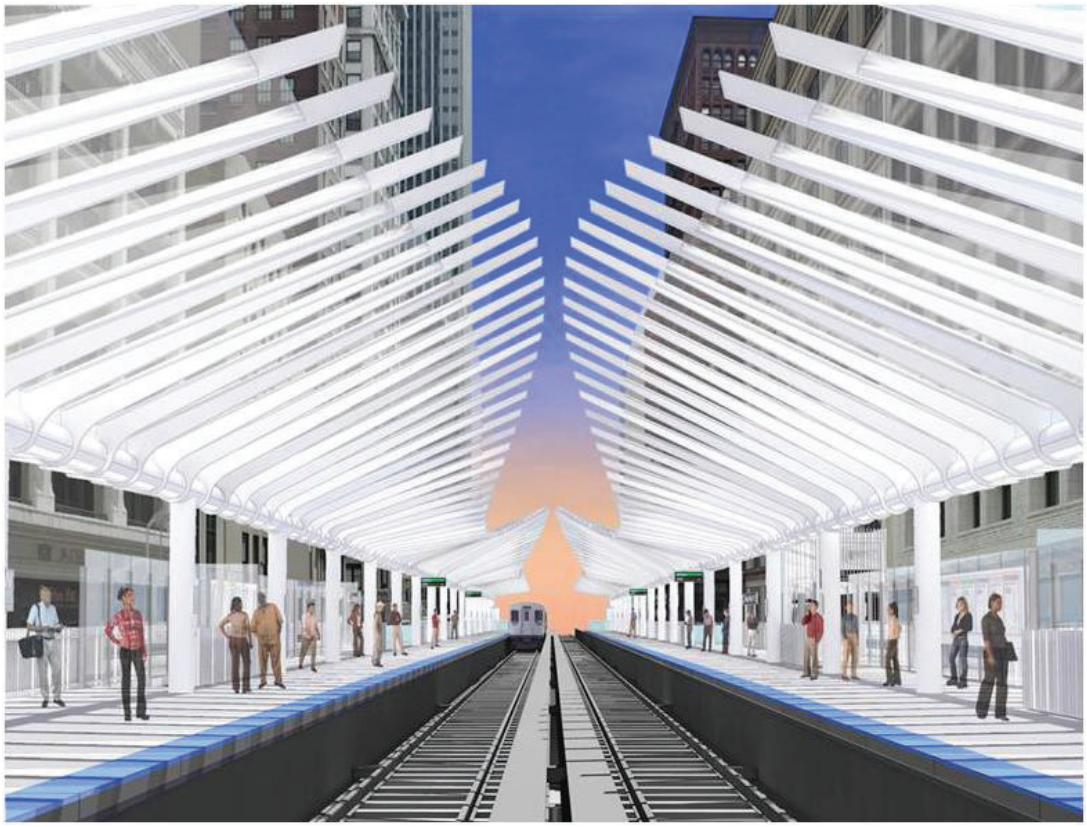
CHICAGO DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

Washington/Wabash Loop Elevated Station

ENVIRONMENTAL ASSESSMENT (EA)

February 2014



Prepared** by the **Chicago Department of Transportation

in cooperation with the Federal Transit Administration

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ENVIRONMENTAL ASSESSMENT (EA)

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Prepared by the Chicago Department of Transportation

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Washington/Wabash Loop Elevated Station Project

City of Chicago, Cook County, Illinois

ENVIRONMENTAL ASSESSMENT

Submitted pursuant to 42 U.S.C. 4332 (2)(c)

by the:

U.S. Department of Transportation

Federal Transit Administration

and the

Chicago Department of Transportation

2-21-2014

Date of Approval

Marisol Simón, Regional Administrator
Federal Transit Administration

2-24-2014

Date of Approval

Rebekah Scheinfeld, Commissioner
Chicago Department of Transportation

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RESPONSIBLE AGENCIES

Lead Agency: Federal Transit Administration

Project Sponsor: City of Chicago - Department of Transportation

WHERE TO FIND COPIES OF THIS DOCUMENT

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Chicago Department of Transportation (CDOT)
30 North LaSalle Street, Suite 1100
Chicago, Illinois 60602

To view an electronic copy of this document please visit the project website at:
http://www.chicagodot.org

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ABSTRACT

The Chicago Department of Transportation (CDOT) proposes to construct a rapid transit station at Washington/Wabash on the Loop Elevated structure for use by Chicago Transit Authority (CTA) rapid transit services. This station would replace two existing 115-year old stations along North Wabash Avenue in Chicago's downtown with a new station that would be accessible to riders with disabilities, would offer improved boarding and alighting efficiencies, and would include safety and security enhancements.

This Environmental Assessment (EA) is prepared under National Environmental Policy Act (NEPA) guidelines to consider the effects and impacts of the construction of the Preferred Alternative for the Washington/Wabash Station on the resources in the vicinity. The potential impacts studied encompass social, economic, and environmental factors, as well as indirect and cumulative effects.

The construction scenarios analyzed include the demolition activities at the Randolph/Wabash and Madison/Wabash Stations, staging, and mitigation of impacts in accordance with construction Best Management Practices (BMPs) and local, state, and federal regulations.

The Federal Transit Administration (FTA) will make an independent evaluation of this EA, supporting documents, and public comments and responses thereto. If the FTA determines that the proposed *Project* would not have a significant adverse impact on the environment and on the social and economic fabric of the surrounding community, a Finding of No Significant Impact (FONSI) would be issued.

SUBMITTING COMMENTS

Comments on this Environmental Assessment must be received by the Chicago Department of Transportation **by 5 PM CST, Friday, April 4, 2014**

Comments may be submitted to the Chicago Department of Transportation via email at:

WashingtonWabashEA@cityofchicago.org

or in writing to the following address:

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30 North LaSalle Street, Suite 1100
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Illinois Historic Preservation Agency	2006 Correspondence (May 3 by City, June 22 by SHPO) 2007 Correspondence (May 16 by City, Aug. 23 by SHPO) 2013 Correspondence (May 7 by FTA, Nov. 5 by SHPO Dec. 20 by FTA)
Historic American Engineering Record (National Park Service)	Files IL-1, IL-1D and IL-1I (ILL-16-CHIG-108,-108D,-108I)
City of Chicago	Excerpt from 1981 City of Chicago *Master Plan for the Loop Elevated Rehabilitation and Historic Preservation*
National Register of Historic Places (NPS) and Chicago Landmarks Commission	National Historic Buildings and National and Chicago Landmarks
C. Research and Data Findings	
Chicago Metropolitan Agency for Planning (CMAP)	Transportation Improvement Program (TIP) Listing - Project ID 01-12-0008
Environmental Justice	CMAP and 2010 U.S. Bureau of the Census Data
Air Quality Conformity Reference for Illinois Hot Spots Analysis Reference	Cook County Non-Attainment Status by Year since 1978 CFR-2011-title40-vol20-sec93-123 – For Carbon Monoxide (CO), Particulate Matter (PM) $PM_{2.5}$ and PM_{10}
Noise Study	Calculations and Graphs
Illinois Department of Natural Resources	IDNR EcoCAT Response IDNR EcoCAT Cook County Endangered Species List
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ACRONYMS AND ABBREVIATIONS

ACBM	Asbestos Containing Building Material
ACHP	Advisory Council on Historic Preservation
ADA	Americans with Disabilities Act of 1990
BMP	Best Management Practice(s)
BRT	Bus Rapid Transit
CDOT	Chicago Department of Transportation
CFR	Code of Federal Regulations
CMAP	Chicago Metropolitan Agency for Planning
CMAQ	Congestion Mitigation and Air Quality Improvement
CO	Carbon Monoxide
CTA	Chicago Transit Authority
EA	Environmental Assessment
EJ	Environmental Justice
EPA	United States Environmental Protection Agency
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FONSI	Finding of No Significant Impact
FTA	Federal Transit Administration
HAER	Historic American Engineering Record
IDNR	Illinois Department of Natural Resources
IHPA	Illinois Historic Preservation Agency
LBP	Lead Based Paint
LUST	Leaking Underground Storage Tank
MAP-21	Moving Ahead for Progress in the 21st Century Act of 2012
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NFA	No Further Action
NFR	No Further Remediation
NHPA	National Historic Preservation Act of 1966
NICTD	Northern Indiana Commuter Transportation District
NPS	National Park Service
NRHP	National Register of Historic Places
SHPO	State Historic Preservation Officer or Office
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users of 2005
SQG	Small Quantity Generator
TIP	Transportation Improvement Program
TOD	Transit Oriented Development
USC	United States Code
UMTA	Urban Mass Transportation Administration
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	Underground Storage Tank

GLOSSARY OF TECHNICAL TERMS

American with Disabilities Act of 1990 (ADA) – This legislation defines the responsibilities and requirements for transportation providers to make transportation accessible to individuals with disabilities.

Best Management Practices (BMPs) – For transportation projects, this term refers to measures taken during construction and demolition to control noise, minimize impact to air quality from idling equipment, prevent release of soils into storm sewers, and provide ongoing updates to surrounding businesses, institutions, and service providers.

Bus Rapid Transit (BRT) – This is a mode of public transportation where bus operations are supplemented with facilities and service qualities resembling those of rapid transit. Facilities to be constructed on Madison and Washington Streets in the *Study Area* as part of CDOT's Central Loop BRT project include tinted bus lanes, BRT stations with level boarding and "Queue Jump" bus priority signal timing.

Environmental Justice (EJ) – This is an overall term for the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Federal EJ policy was codified in 1994 by Executive Order 12898*, Federal Actions to Address Environmental Justice in Minority Populations and Low-income Populations*.

Historic American Engineering Record (HAER) - This was established in 1969 by the National Park Service, the American Society of Civil Engineers and the Library of Congress to document historic sites and structures related to engineering and industry and it was later joined by four other engineering societies.

Finding of No Significant Impact (FONSI) – This is the decision document to be issued by a project's lead federal agency (for this project, the Federal Transit Administration) if, after the environmental assessment is prepared and public comments are received and addressed, the proposed project is not expected to have significant negative impacts.

Moving Ahead for Progress in the 21st Century Act (MAP-21) – This federal act, signed into law in 2012, funds surface transportation programs at over $105 billion for FY 2013 and 2014 and consolidates federal programs. It is the successor to SAFETEA-LU. (See below.)

National Environmental Policy Act (NEPA) – This federal law (40 CFR §§ 1500-1508) requires consideration of the potential impacts on the environment of proposed federal actions (including projects that use federal grant funds).

National Register of Historic Places (NRHP) – Managed by the National Park Service, this is the official list of historic places in the United States determined to be worthy of preservation. Authorized by the National Historic Preservation Act of 1966, it is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect America's historic and archeological resources.

Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) – This federal act, signed in 2005, guaranteed funding of $224.1 billion for highways, highway safety, and public transportation and specified transportation policies. It was succeeded in 2012 by MAP-21. (See above.)

Section 106 – This section of the National Historic Preservation Act (16 U.S.C. 470f) requires federal agencies to take into account the effects of federally funded projects on historic resources in the vicinity of construction activities.

Section 4(f) – This section of the Department of Transportation Act of 1966 restricts the use of publicly owned parks, recreation areas, wildlife and waterfowl refuges, and public or private historic sites for federally funded projects. Portions were revised by SAFETEA-LU legislation.

Title VI – This section of the Civil Rights Act of 1964 prohibits discrimination on the basis of race, color, and national origin in programs and activities funded by the federal government.

Transit Oriented Development (TOD) – This term describes urban mixed land use development focused on access to surrounding transit facilities.

1 EXECUTIVE SUMMARY

The Chicago Department of Transportation (CDOT) proposes the construction of a new Washington/Wabash Elevated Station on the Loop Elevated structure to be used by rapid transit service on Chicago Transit Authority's (CTA's) Brown, Green, Orange, Pink, and Purple Lines. This fully-accessible station would replace and consolidate operations of two 115-year old elevated stations in Chicago's Central Business District: Randolph/Wabash Station to the north and the Madison/Wabash Station to the south.

The lead federal agency on this project is the Federal Transit Administration (FTA), because construction would use federal Congestion Mitigation and Air Quality improvement funds through an FTA grant. In order to receive approval to proceed with construction of the Washington/Wabash Station, CDOT has been following National Environmental Policy Act (NEPA) guidance in preparing this Environmental Assessment (EA).

This executive summary describes the National Environmental Policy Act (NEPA) process, the structure of this EA, the *Project* purpose and need, the objectives that it fulfills, and the basics of the proposed construction and its impacts. Mitigation measures related to anticipated construction impacts are summarized.

NOTE: In this document, certain shortened names are used for clarity, consistency, and/or simplicity. The entire scope of work that includes station removal and construction is simply the "Project." The stations are often identified as "Randolph/Wabash Station," "Madison/Wabash Station," and "Washington/Wabash Station" without the words "Loop" or "Elevated." The structure carrying CTA rapid transit trains above streets in Chicago's downtown is known variously to the public as the "L", the "Loop," the "Elevated" and the "Loop Elevated," but "Loop Elevated" is used throughout this document unless a historical document is directly quoted.

1.1 NEPA Process and this EA

This document has been prepared by the FTA as the lead federal agency and by the Chicago Department of Transportation (CDOT) as its grantee to comply with the National Environmental Policy Act (NEPA). Enacted in 1969, NEPA's overarching mission is for federal agencies that implement or fund projects to fulfill their responsibilities as trustees of the environment for succeeding generations. Therefore, this NEPA EA study documents the potential for impact on natural, cultural, and historical resources within the *Project Area (*Figure 2*),* immediately adjacent to the proposed perimeter of the Washington/Wabash Station, and the *Study Area, (*Figure 3). The *Study Area* is ⅛ of a mile around the periphery of the *Project Area*.

The purpose of this EA is to provide CDOT, FTA, and the public with information to make an informed decision about this proposed *Project*. The findings of this study will be published and distributed to the public via several media. A public hearing will follow and the public will be given the opportunity to comment. Responses to public comments will be made available by CDOT. If FTA determines - after an independent evaluation of findings, public comments, and responses to comments - that the negative impacts from the *Project* would be less than significant, a Finding of No Significant Impact (FONSI) would be issued and this *Project* would proceed to completion.

1.2 Structure of this Environmental Assessment

This EA is composed of five sections. The Executive Summary gives an overview of the NEPA process and the *Project*. The second section, "Purpose and Need For Action", describes how the construction of the Washington/Wabash Station would resolve identified deficiencies of the east leg of the Loop Elevated and would fulfill essential objectives. The third section presents the three alternatives considered for this *Project,* including a No Build Alternative. The fourth section, "Affected Environment, Environmental Consequences and Proposed Mitigation,"

details the potential impacts of the *Project* on particular social, economic, and physical resources as well as planned mitigation measures. The fifth and final section outlines Public Involvement and Project Coordination.

1.3 *Project* Purpose and Need

The purpose of the Washington/Wabash Station *Project* is to address deficiencies on the east leg of the Loop Elevated, along North Wabash Avenue, generally between and including East Randolph Street on the north and East Madison Street on the south. The *Project* need is to provide an accessible, safe, and efficient public transit infrastructure for all riders.

The two current stations are unable to properly serve people with disabilities, have constrained capacity with narrow platforms, have an awkward retrofitted layout of fare collection equipment, and lack the quality of lighting, security, and real-time travel information that contemporary transit customers expect.

The Loop Elevated structure has historic significance for Chicago's downtown. Built in 1897, the Loop Elevated has retained its viability because the stations along its route have been consolidated and renovated over time. The two stations on North Wabash originated with the Loop itself but are an accumulation of piecemeal improvements over the decades, all of which are beyond their useful life.

Preserving the structural and operational viability of the Loop Elevated is a *Project* objective expressed in the *1981 City of Chicago Master Plan for the Loop Elevated Rehabilitation (1981 Loop Master Plan)*. Among the recommendations in the plan were the consolidation of pairs of stations on Wells Street and Wabash Avenue, both at Washington Street. These would better serve customers and result in two stations per side of the Loop Elevated structure. The Wells Street stations were consolidated in the 1990's and this *Project* would consolidate the Wabash stations.

Having a quality, accessible station is especially important at this high profile location that is crucial to the CTA rapid transit system. It serves a total of almost 700 train runs each day on five different lines and is also the primary transfer point to Metra Electric commuter rail service and the upcoming Central Loop Bus Rapid Transit (BRT) project. It serves a mix of destinations; it is not only adjacent to the Jewelers Row shops and a block from the historic retail center of State Street, but it is also the gateway to the Chicago Cultural Center, Michigan Avenue, the Pritzker Pavilion and the Harris Theater in Millennium Park, and the high-rise office, hotel, and residential buildings of River East including Aon Center, Two Prudential Plaza, Aqua, and Blue Cross-Blue Shield Tower (the 6th, 15th, 44th, and 86th tallest buildings in the US, respectively).

1.4 Objectives Addressed by this *Project*

The *Project* addresses the identified deficiencies and serves the goals of improving customer satisfaction and maintaining a viable Loop Elevated structure. It would provide the first Americans with Disabilities Act (ADA)-compliant station on the east leg of the Loop Elevated. Wider platforms and more turnstiles would improve the flow of passenger traffic, making access and egress safer and more efficient. Modern amenities that would come with the new Washington/Wabash Station include escalators and elevators, brighter, energy efficient lighting, better protection against wind and inclement weather, and electronic signage and announcements. These amenities would create a pleasant, safe environment, encouraging more riders to use the rapid transit lines on the Loop Elevated to travel to and from the many residential, work, retail, cultural, and recreational destinations nearby.

1.5 Alternatives Considered for this *Project*

There are three alternatives discussed in this EA. Two of them, the Preferred and Non-Preferred Alternative, each include a consolidated station as the preliminary design. The station house in the Preferred Alternative is primarily in a mezzanine above the street and below the track level. In the Non-Preferred Alternative, the station house would be located inside the historical Haskell building. This option was removed from further consideration after discussions with the Illinois Historic Preservation Agency (IHPA). The third alternative, the No Build scenario, is included for comparison.

1.6 Summary of Potential Impacts and Mitigation Measures

Potential direct impacts from the construction of the new Washington/Wabash Station were reviewed and itemized in Section 4 of this document, "Affected Environment, Environmental Consequences and Proposed Mitigation."

The section is subdivided into resource categories pertinent to the urban environment of the *Study Area*. These include potential effects on land use and zoning, on the local economy and neighborhood, on minority and low-income populations, on cultural, historical, and natural resources such as architecturally significant buildings and parks, on the visual or aesthetic resources, on security and safety, on traffic and parking, and on air quality.

Physical environmental impacts related to soil and water quality, sustainability, floodplains were also researched. Due to the *Project's* location, it was deemed unnecessary to review the following resources: sole source aquifers, coastal zones, wild and scenic rivers, and prime and unique farmland.

Based on the review of the resources outlined above, no long-term negative impacts of significance were identified.

The short-term impacts from construction and associated demolition activities are summarized in Table 4 following Section 4.19 (Construction-Related Impacts). To reduce short-term transit access impacts, construction would be staged in two phases. In the first stage, the Randolph/Wabash Station would remain open during the demolition of the Madison/Wabash Station and construction of the Washington/Wabash Station. After the completion of the Washington/Wabash Station, the second stage would begin with the demolition of the Randolph/Wabash Station.

2 PURPOSE AND NEED FOR ACTION

The Randolph/Wabash and Madison/Wabash Stations on Chicago's Loop Elevated serve five rapid transit lines and constitute a gateway to office and retail complexes, cultural and recreational resources, public and educational institutions, and residential developments. These two aging stations have become increasingly difficult and costly to maintain, and lack proper access for people with disabilities. While there have been piecemeal improvements over the last 115 years, such as the cosmetic improvements to the exterior of the Randolph/Wabash Station in 1957, these two stations are well beyond a standard 50-year service life for such facilities.

The cost of rebuilding both stations would be high and would be an inefficient use of public resources given their close spacing – less than 800 feet apart. Therefore, the Chicago Department of Transportation (CDOT) and the Chicago Transit Authority (CTA) propose to address several objectives by consolidating the Randolph/Wabash and Madison/Wabash Stations into a new, attractive, fully-accessible station at Washington/Wabash that would have greater boarding capacity than the two stations it would replace, combined. Such a consolidation would not only be consistent with plans that date back to 1981 (*1981 Loop Master Plan*), but would match a similar consolidation (also in the 1981 plan) on the Wells Street side of the Loop Elevated in 1994-1995.

The primary goals of CDOT and CTA for this *Project* are to satisfy existing and potential transit customers with accessible, safe, and efficient facilities, to address physical and operational deficiencies in a cost efficient manner, to support neighboring businesses and institutions, and to improve the viability and visibility of transit as a travel option for Chicagoans and visitors.

Because CDOT and CTA each owns parts of the public transit infrastructure operated by CTA in Chicago, they work together to improve that infrastructure. CDOT often serves as the lead design, engineering and construction agency on such projects in the Central Area, and would serve as the lead on this *Project* as well.

This section begins with the *Project's* background including its location, the urban transportation planning context, and an overview of CTA's transit service. This is followed by a discussion of the overarching purpose of the Washington/Wabash Station to address the deficiencies of the east leg of the Loop Elevated. The next subsection describes the needs that this *Project* is intended to address, and details the objectives to meet those needs.

2.1 *Project* Background

The *Project* location is in a thriving downtown business district. The predominant activities are retail and commercial, as they have been for over 100 years, although more recently there has been an increased presence of educational and cultural institutions in this area, as well as high-rise residential development and redevelopment. The surrounding land uses epitomize the objectives of Transit Oriented Development (TOD).

Rapid transit trains have defined this urban landscape since 1897, when the Union Elevated Railroad began operations along what later came to be called the Loop Elevated. These elevated tracks are a historic and economic resource whose viability can only be maintained if it serves its role well as a public transportation facility. One aspect of this is that the stations along its route are fully accessible and attractive to customers. As a result, there have been many changes to the stations along the Loop Elevated over the decades, with some undergoing renovations, others being demolished, and new ones being constructed.

To continue these efforts, the *1981 Loop Master Plan* recommended a number of station-related projects to support the viability and vitality of the Loop Elevated. One of these future projects was the replacement of the Randolph/Wabash and Madison/Wabash Stations with a consolidated Washington/Wabash Station.

2.1.1 Location and Construction Limits

The maps in figures 1 through 4 identify the *Project* location in different contexts. Figure 1 shows the Loop Elevated, past and present, including the fact that none of the stations on the east (Wabash Avenue) leg are Americans with Disabilities Act (ADA)-compliant, whereas there is already one accessible station (marked with the International Symbol of Access) on each of the other three legs.

The planned limits of the *Project Area* are depicted in Figure 2. The new station limits extend along Wabash Avenue from Washington Street to 150 feet south of East Madison Street. However, the *Project Area* also includes the demolition area for the Randolph/Wabash and Madison/Wabash Stations which extends along Wabash Avenue from 300 feet north of East Randolph Street to 300 feet south of East Madison Street.

The *Study Area* used in several evaluations in the EA, is shown in Figure 3. It extends ⅛ of a mile beyond the perimeter of the *Project Area*. Figure 4 uses federal USGS topographic maps to depict the *Study Area* in the larger urban context of downtown Chicago including major thoroughfares and natural features.

2.1.2 Public Transit Service Overview

The CTA serves the City of Chicago and 35 of its suburbs. On an average weekday, there are about 1.7 million rides taken on CTA's bus and rail lines. These connect to commuter long distance rail stations, a suburban bus system, as well as two international airports. CDOT and CTA regularly upgrade facilities to be accessible to people with disabilities; 97 of the CTA's 145 rail stations now meet ADA accessibility standards.

The east (Wabash) leg of the Loop Elevated currently serves 673 train operations each weekday on five CTA rail lines: Orange, Brown, Green, Pink, and Purple (it also serves as a detour route for the Red Line). The two existing stations in the *Project Area* served a total of over 4,300,000 entering passengers in 2012 – a number that has more than doubled in the past twenty years (See Figure 5). Randolph/Wabash served 2,311,684 entering passengers, averaging 7,676 on weekdays, 3,862 on Saturdays and 2,604 on Sundays. Meanwhile, Madison/Wabash served 2,036,939 passengers, averaging 6,797 on weekdays, 3,375 on Saturdays and 2,172 on Sundays.

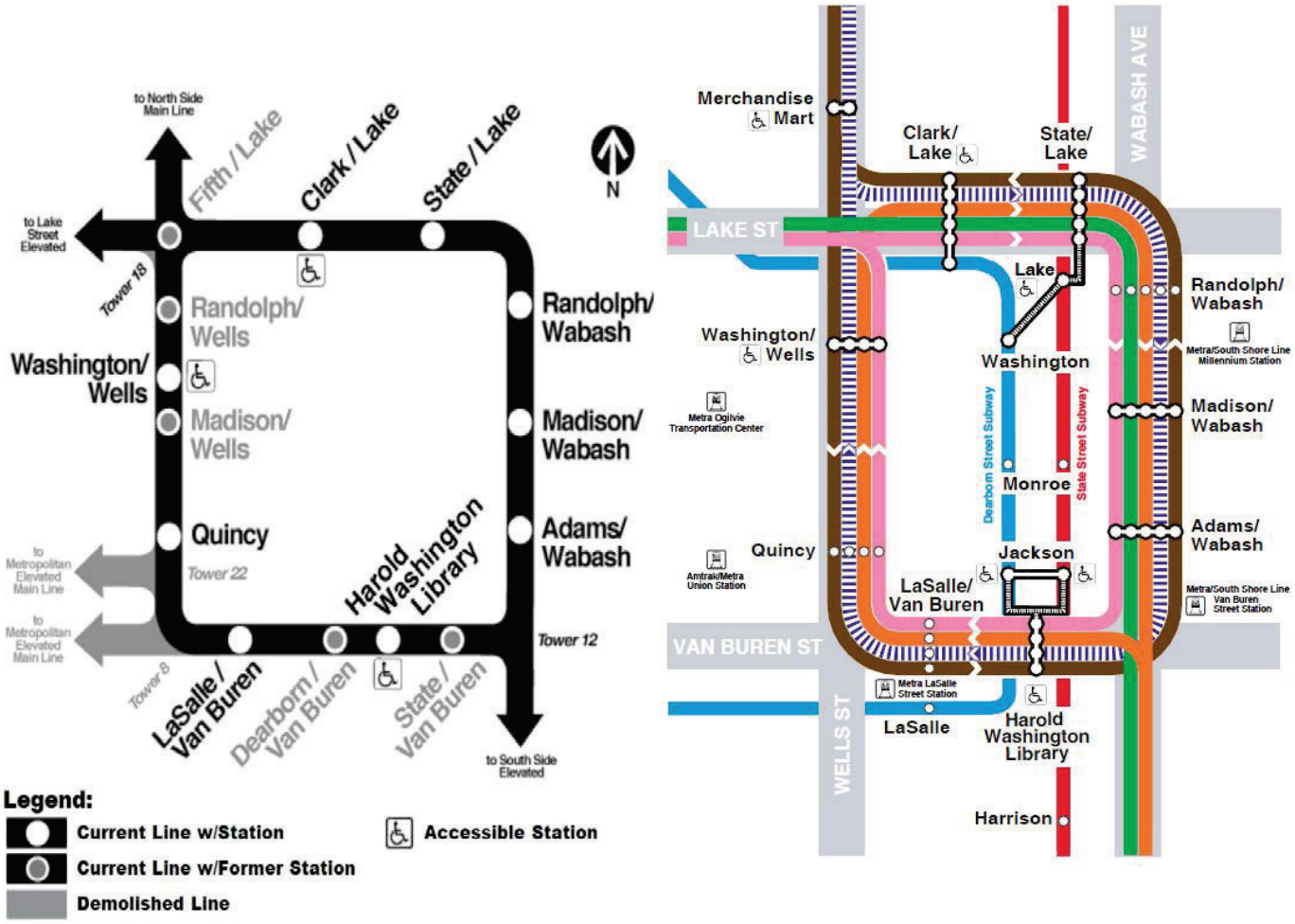
There are two subway lines immediately to the west of the *Project Area*. One block away, underneath State Street, is the Red Line - the most heavily used rail route in the CTA system. Two blocks west, below Dearborn Street, is the Blue Line - which serves O'Hare International Airport at its northern terminal. (Transfers to the Red and Blue Lines can also be made at the State/Lake and Clark/Lake Stations on the Loop Elevated, respectively.)

Nine CTA bus routes (J14, 19, 20, 56, 60, 124, 147, 151, 157) pass below the east leg of the Loop Elevated on either Madison Street, Washington Street or both. Thirteen more (2, 3, 4, 6, 7, 10, 26, 29, 36, 62, 143, 146, 148) operate in the Study Area on State Street and/or Michigan Avenue.

The new Washington/Wabash Station would become the closest rapid transit station to Millennium Park and to Millennium Station (located below the park), which is a terminal for the Metra Electric and NICTD South Shore commuter trains.

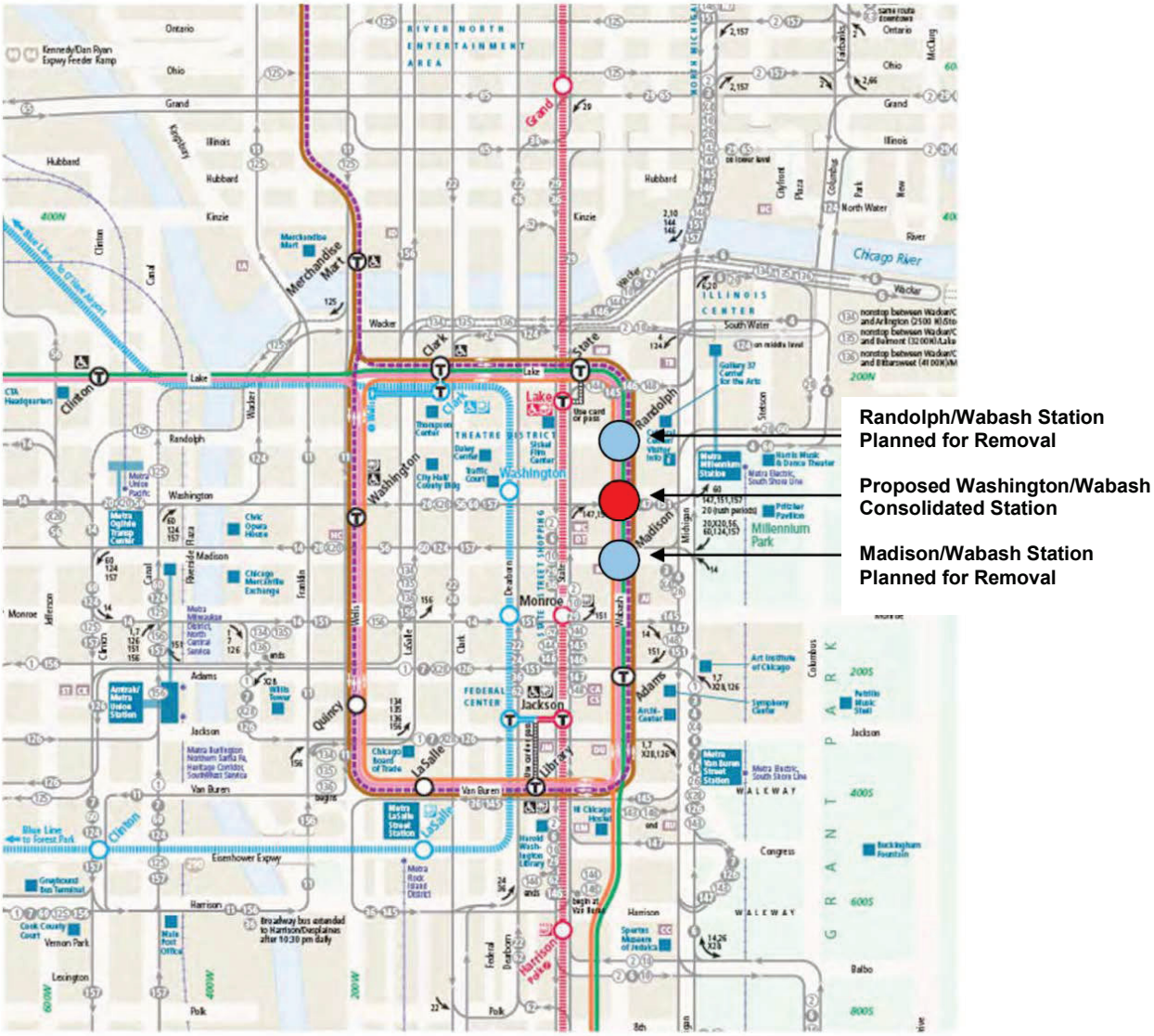
The new station would also serve notable destinations such as the Chicago Cultural Center, Grant Park, academic facilities of the School of the Art Institute, DePaul University, Roosevelt University, and Columbia College, as well as a wide variety of commercial establishments.

Figure 1 – Downtown Loop Elevated Stations and CTA Lines - Past and Present



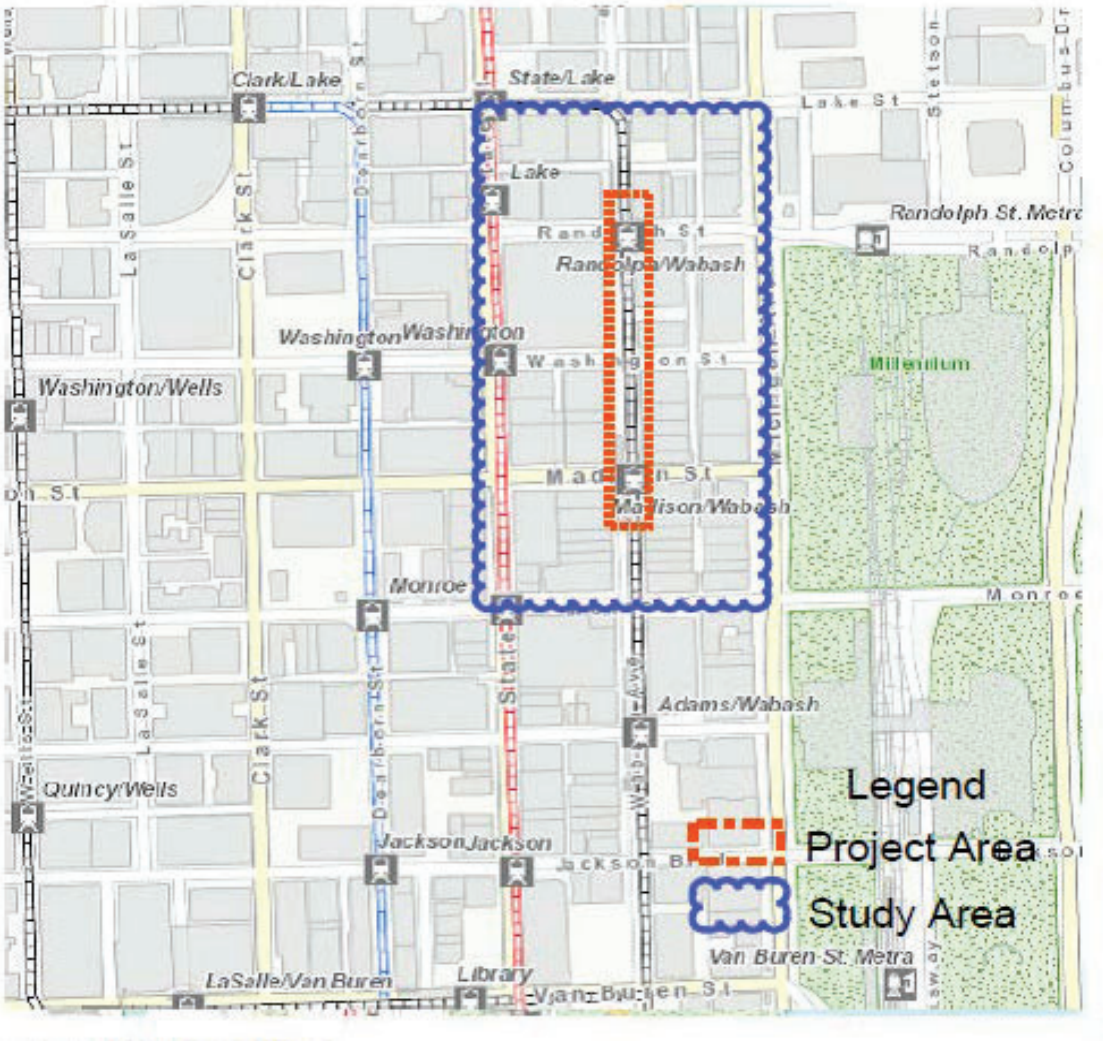
Sources: http://www.chicago-l.org/operations/lines/loop.html
http://www.transitchicago.com/maps/

Figure 2 – Washington/Wabash Elevated Station *Project Area*



Source: *Chicago Transit Authority (CTA)*

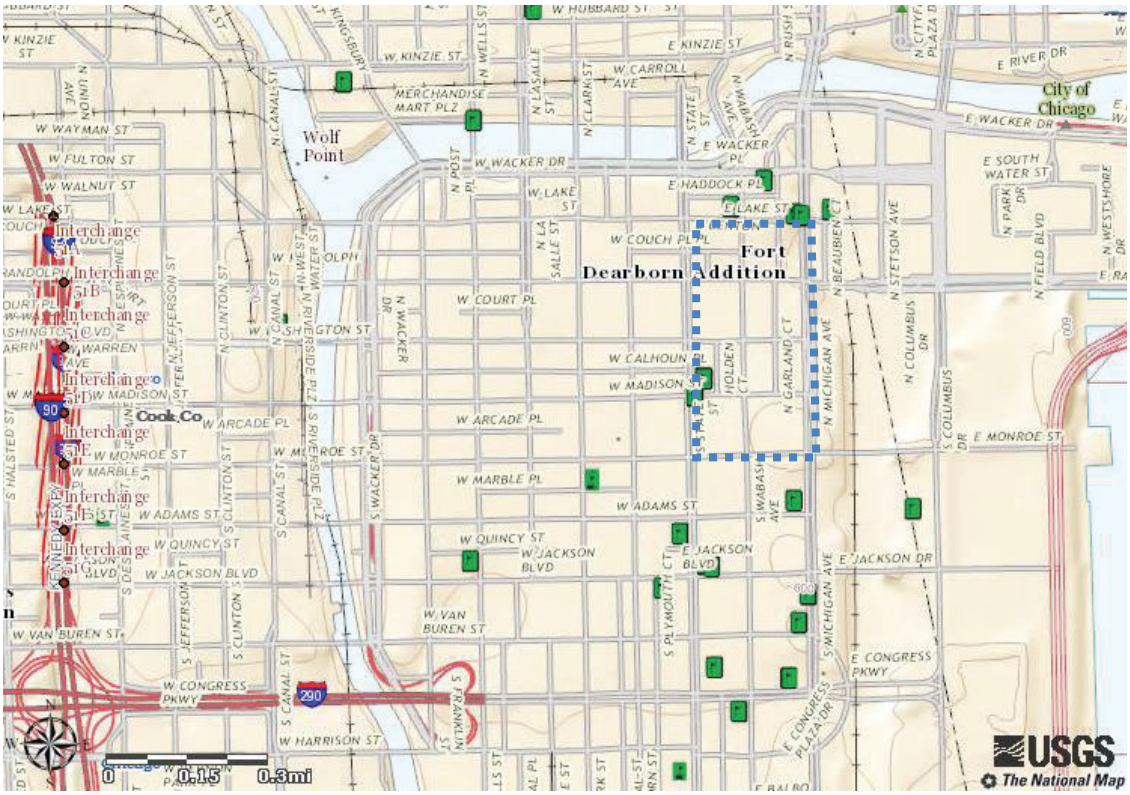
Figure 3 – Washington/Wabash Elevated Station *Study Area*



Source: *Chicago Department of Transportation (CDOT)*

Figure 4 – Topographic Maps including Roads and Highways

***(Study Area* is indicated by blue dashed lines)**



Above: present day web-based map; Below: scan of past paper map from USGS website

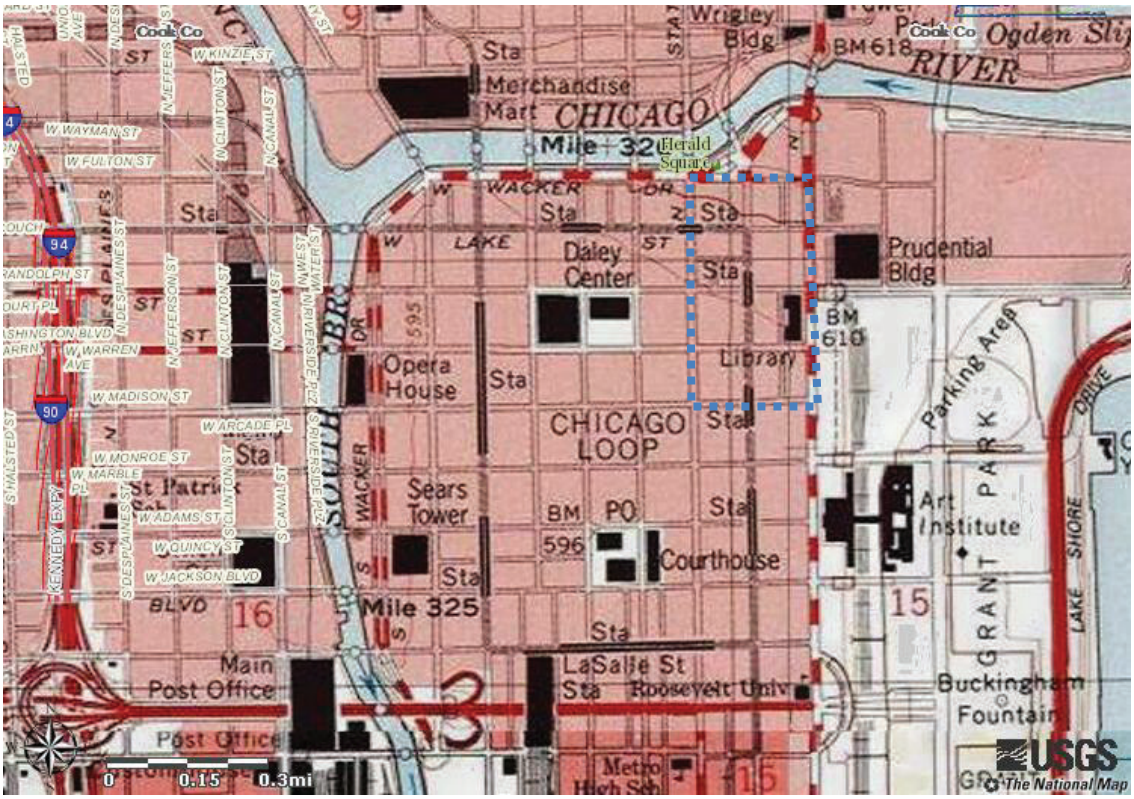
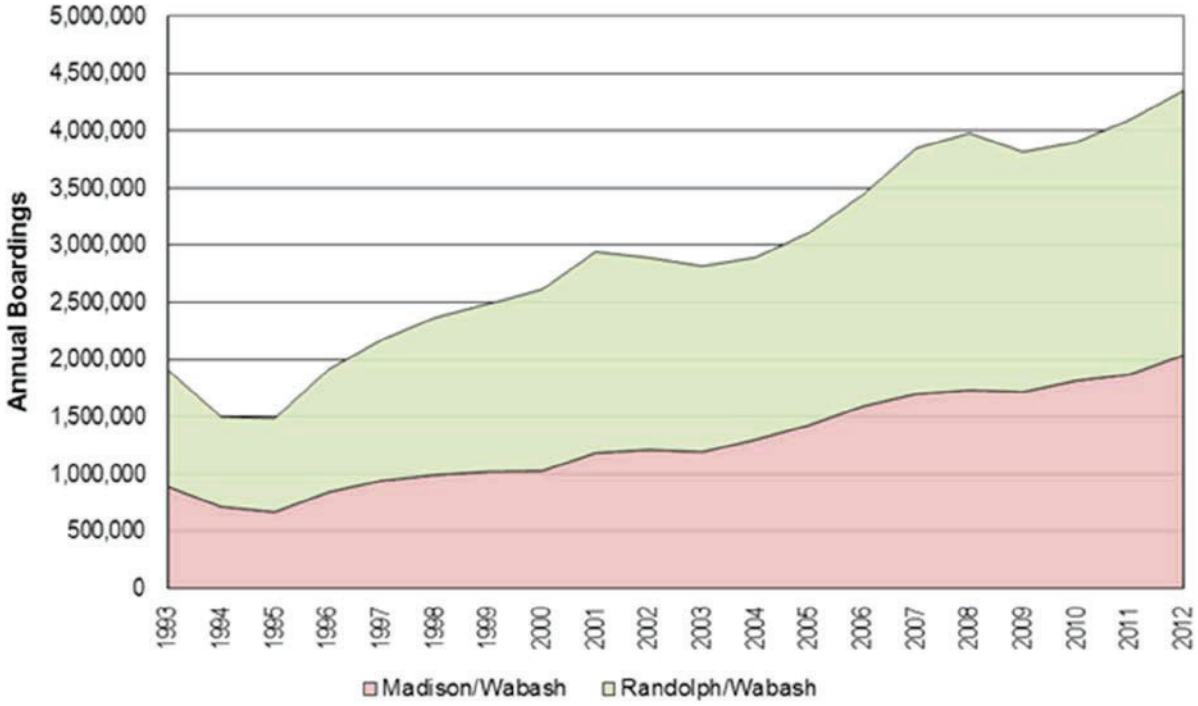


Figure 5 – CTA Rail Boarding Trends at Randolph/Wabash and Madison/Wabash Stations



2.1.3 Transportation and Urban Planning Context

This *Project* fits into several of the City's and region's transportation and urban planning initiatives. Consistency with Regional Land Use Plans is discussed in greater detail in Section 4.2.1.

The *1981 Loop Master Plan* called for the consolidation of closely spaced stations. This *Project* would be the sixth station project to be implemented of the eight proposed in the plan, and it would fulfill the objective of having two stations placed uniformly on each of the four legs of the Loop Elevated. The Washington/Wabash Station would mirror the work completed at the Washington/Wells Station in 1994-95, when the Randolph/Wells and Madison/Wells Stations were demolished and replaced with a consolidated Washington/Wells Station. (See Figure 1.)

The Chicago Metropolitan Agency for Planning (CMAP) *GO TO 2040 Comprehensive Regional Plan (CMAP, October 2010)* incorporates by reference all rehabilitation and reconstruction projects identified in the CMAP Transportation Improvement Program (TIP). The "Washington/Wabash Consolidated Station" listing in the TIP has been assigned ID number 01-12-0008 and is included in Appendix C.

The Chicago Central Area Action Plan (Chicago Plan Commission, 2009) is intended to encourage the implementation of policies and projects essential for downtown Chicago's effective functioning, growth and quality of life. The *Chicago Forward Department of Transportation Action Agenda* (CDOT, May 2012) sets forth principles and current priorities for transportation infrastructure and policy. Both include the *Project* in itemized lists of recommended projects.

2.2 *Project* Purpose

The purpose of this *Project* is to address deficiencies in the current rapid transit stations on the east leg of the Loop Elevated, along North Wabash Avenue generally between East Randolph Street and East Madison Street. Customer satisfaction and the structural integrity of transit facilities are paramount goals for CDOT and CTA. After reviewing current conditions and consulting with local, state, and federal agencies, CDOT proposes to consolidate two obsolete stations into the single new Washington/Wabash Station. This new station would provide accessible, safe, and efficient transit to more riders in the Chicago area.

From the long range planning perspective, the *Project* is intended to contribute toward encouraging the use of public transit. Increased ridership would support the urban economy and compact land use development, while reducing traffic congestion, vehicle miles traveled, and air pollution from automobile tailpipe emissions.

2.3 *Project* Need and Objectives

The improved access, safety, and operational features of a new consolidated Washington/Wabash Station would rectify several problems with the existing system. CTA riders with disabilities currently lack ADA access to the Loop Elevated on Wabash Avenue. Having three stations in close proximity to each other on one side of the Loop Elevated is inefficient and results in operational costs and travel times that are greater than necessary. Both existing stations are outmoded, lack capacity for ridership growth, and are not conducive to attracting to new riders; for example, the Madison/Wabash Station mezzanine has too few turnstiles and low overhead clearances.

In 2011, an interagency Infrastructure Accessibility Task Force convened by CTA identified 11 criteria to prioritize ADA station improvements. Based on its final scoring of these criteria in 2012, the Randolph/Wabash Station ranked 8th on the list of 48 stations (the highest not on the Red Line) and Madison/Wabash was 12th.

To address these needs, specific objectives have been identified for the *Project* : to provide a rapid transit station whose design is ADA-compliant for the first time on the east leg of the Loop Elevated; to improve operational efficiency; to improve vertical clearance and pedestrian traffic flow for transit customers; to add capacity for ridership growth that can lead to improved air quality; to provide features in the design to increase safety and security; and to support the continued viability of the Loop Elevated as a whole. Detailed descriptions of the proposed design and construction elements for the Washington/Wabash Station are found in Section 3.1 (Preferred Alternative) and Exhibit 1 of Appendix A.

2.3.1 ADA Compliance

The new station would be fully ADA-accessible. On each side of the street would be pairs of elevators, one elevator between street level and one of the "unpaid" sections of the mezzanine level, and one between the "paid" area of the mezzanine and the platform level. (See Section 3.1.1.1 for further details). On each end of the mezzanine, one of the turnstile positions would be a wheelchair-accessible gate.

2.3.2 Operational Efficiencies

The consolidated Washington/Wabash Station would save travel time for riders since there would be one stop rather than two for each train running between the State/Lake and Adams/Wabash Stations. Time saved in travel and other benefits as quantified in the Congestion Mitigation and Air Quality Improvement (CMAQ) application for this *Project* are enumerated in Section 3.1.2 (Preferred Alternative - Benefits).

The single new station would be less costly for CTA to maintain and staff than two aging stations with worn and outmoded equipment. CTA would also have more energy efficient operations due to modernized lighting, electrical and mechanical systems and the elimination of one acceleration cycle on each train run on the Loop Elevated.

2.3.3 Pedestrian Traffic Flow and Vertical Clearance

The current stations have pedestrian routes that are constrained in width and height. The proposed design of the new station would have better vertical access, larger mezzanines with higher vertical clearance, and wider platforms.

2.3.3.1 Traffic Flow

At street level, sidewalks would be widened to protect each entrance. As stated above in the discussion of ADA compliance, access from the street level would include an escalator and elevators (not present in either of the two existing stations) as well as four regular stairwells which have a clearance width of at least 5' wide, about a foot (25%) wider than most stairs at the current Madison/Wabash and Randolph/Wabash Stations.

The escalator and one of the elevators would be located in the northeast quadrant of the station, which is expected to be the heaviest traveled quadrant. This corner of the station would be the closest entrance for the high-rise buildings of River East, the performance venues in Millennium Park, and transfers to Metra Electric service at Millennium Station.

The mezzanine level would be approximately 7,200 square feet, compared to approximately 3,200 square feet at the existing Madison/Wabash Station and a narrow walkway at Randolph/Wabash Station (where fare collection is at platform level).

There would be separate unpaid areas at both ends of the mezzanine, each with seven to eight turnstiles in a row (including one wheelchair accessible gate on each side) which would be immediately visible at the top

of the stairs/escalators. Fare vending equipment and customer information signs would be on the opposite wall nearest the stairs thereby reducing conflict between their use and the primary traffic flow of entering/exiting customers.

In the central "paid" area of the mezzanine, there would be train tracker monitors and contemporary signage to guide customers to both the inner and outer Loop platforms with two more 5-foot-wide stairs and an elevator to each platform.

The new station would have wider platforms than those in the existing stations (10-to-16 feet instead of 7.5-to-12 feet). The platforms would each have four exit points: two stairs to the mezzanine, an elevator to the mezzanine, and an exit-only stair at the south end that would connect directly to the south side of Madison Street.

2.3.3.2 Vertical Clearance

On the mezzanine level of Loop Elevated stations, vertical clearance for customers is constrained by the track support structure above and the vertical clearance for vehicles on the street below. Objects attached to the ceiling of the mezzanine can further reduce clearance at specific points.

At the current Madison/Wabash mezzanine, the lowest ceiling area height is 6 feet 5 inches and a conduit reduces clearance to 6 feet 3 inches. At the Randolph/Wabash mezzanine walkway (fare collection is at track level), the lowest ceiling height is 6 feet 4.5 inches, and a covered overhead pipe further reduces clearance to as little as 6 feet 1.5 inches.

The proposed minimum mezzanine ceiling height for the new Washington/Wabash station is 7 feet, increasing to at least 8 feet where there is no track overhead. This condition is similar to the most recently constructed mezzanines on the Loop Elevated at the Washington/Wells and Harold Washington Library Stations. Security cameras would reduce clearance to 6 feet 10.5 inches.

Table 1 below shows the net improvement of clearances between the existing stations and the new design.

Table 1 – Vertical Clearance Comparisons of proposed station and existing stations

From	To	Proposed Washington/ Wabash Station	Existing Madison/ Wabash Station	Proposed Clearance Increase	Existing Randolph/ Wabash Station	Proposed Clearance Increase
Lowest Continuous Ceiling Area	Floor	84"	77"	7" = 9%	76.5"	7.5" = 10%
Lowest Point of Obstruction	Floor	82.5"	75"	7.5" = 10%	73.5	9" = 12%

2.3.4 Capacity for Growth, Increasing Ridership

A greater number of turnstiles, an improved fare collection system, wider platforms, and auxiliary entrances (with high barrier gates) would better serve passengers, especially during peak travel periods.

The modernization of the station would eliminate capacity constraints and accommodate ridership growth. The total entrance capacity would increase to 15 turnstiles from the total of 14 at the two stations it would replace. There would be eight turnstiles on the Washington end of the mezzanine, and seven at the Madison end, including a wheelchair-accessible gate at each end. During special events CTA can install up to three temporary turnstiles at the service equipment gate to add additional capacity.

The open design of the new station is expected to attract residents as well as visitors and tourists. As the Loop Elevated station closest to many North Michigan Avenue attractions, the office and residential high rises of the Illinois Center and River East areas and Millennium Park, there is a clear market to be served. The availability of elevators and wheelchair-accessible turnstiles would also benefit people with luggage traveling between downtown and Midway Airport on the Orange Line, or to other destinations.

As mentioned in *Project* Purpose above, more riders on the CTA system would translate into fewer auto trips on the road. This would lead to a decrease in traffic congestion and air pollution resulting in improved air quality. Calculations related to estimating the number of motor vehicle trips diverted and eliminated is included in Section 3.1.2 (Preferred Alternative-Benefits).

2.3.5 Safety and Security

Safety and security features such as well-lit platforms, emergency response equipment, modern communication systems, electronically controlled real time signage (including train and bus tracker monitors) and improved weather protection and lighting all would create a brighter and safer transit environment. The escalators, elevators, and wider platforms would be convenient and safer in all weather.

2.3.6 Maintaining Viability of the Historical Loop Elevated

The construction of the Washington/Wabash Station is specified by the *1981 Loop Master Plan.* That plan determined that the key to preserving the historic Loop Elevated was to keep it viable as a well-used transportation facility. The stations along its route must be in good repair, meet current accessibility, safety, and security standards, and satisfy current and potential public transit users. Such changes must also help maintain the historical integrity of the Loop Elevated as a structure and of the architectural and cultural resources within the *Project* and *Study Areas*.

3 ALTERNATIVES

After confirming the lack of accessibility and other inadequacies at the Randolph/Wabash and Madison/Wabash Stations, CDOT proceeded to evaluate alternatives to modernize the east leg of the Loop Elevated and provide accessibility.

Due to the high cost of renovation and maintenance for these two stations built in 1897, CDOT and CTA have concluded that demolition and replacement by a single station would be a more cost-effective solution. This is consistent with past and current plans for the Loop Elevated and the rest of downtown Chicago. A similarly-conceived station at Washington/Wells, built in 1995, demonstrated the feasibility and benefits of consolidating two outmoded and closely spaced stations into a single, modern facility. In 2006, CDOT - in consultation with CTA - began planning and design of a consolidated Washington/Wabash Station.

In accordance with the NEPA process, more than one alternative was evaluated. The Preferred Alternative and Non Preferred Alternative, both proposed to build a new consolidated Washington/Wabash Station, but differ in the placement of the station house. The No Build Alternative was also investigated to serve as a baseline comparison.

3.1 Preferred Alternative

The 2007 design for a consolidated Washington/Wabash Station with a mezzanine-level exterior station house design was chosen as the Preferred Alternative. It would satisfy the *Project* objectives of ADA access, improved safety, and operational efficiency. It would also fit within the larger transportation and urban planning context by contributing to the preservation of the viability of the historic Loop Elevated structure, and inviting increasing ridership. Its open design would offer a less obstructed view of the architecturally and culturally significant structures along Wabash and Michigan Avenues. Given the historical resources near the *Project Area*, CDOT consulted with the Illinois Historic Preservation Agency (IHPA). Following an opinion from the IHPA's State Historical Preservation Officer (SHPO) that the design presented would be able to meet standards related to the rehabilitation of historic structures, this design was chosen by CDOT as the Preferred Alternative.

The platform and overhead views of the Preferred Alternative are illustrated by Figures 6 and 7 respectively; cross-sections and additional illustrations are provided in Exhibit 1 of Appendix A.

3.1.1 Conceptual Design Elements

The conceptual design elements of the new proposed Washington/Wabash Station address the *Project*'s objectives of access, safety, and operational efficiencies. They include wider platforms, ADA-compliant elevators, and a more effective turnstile layout. For improved security and comfort, bright lighting, windbreaks, and overhead heaters are also incorporated.

3.1.1.1 Access

For improved access and increased capacity there would be stairs and pairs of elevators on each side of the street. One elevator would take passengers from street level to the mezzanine level, and another would go from the "paid" area of the mezzanine to the platform level. There would be an escalator and two stairwells for exiting passengers, midway between East Washington Street and East Madison Street. Two auxiliary entrance/exit stairs would be located on each side of South Wabash Avenue just south of East Madison Street, to serve riders accustomed to accessing the former station at that location. Overall, the distance to the stairs would change and be slightly closer for some transit customers and slightly farther for others.

3.1.1.2 Capacity, Safety and Security

To accommodate more passengers and maintain safety this new station would have platforms nearly twice as wide as the current stations, enlarged from the existing width of 7.5 feet to 10-to-16 feet. The total entrance capacity would increase to 15 turnstiles from the current 14.

There would also be a public address system for travel and emergency announcements and train tracker monitors would be installed.

The new station would have an Essential Transit System (ETS)/Uninterruptible Power Supply (UPS). In addition there would be a backup lighting system to provide security for CTA riders in event of a power failure or emergency. With lighting of all station locations, a backup electrical supply system, and twenty (20) surveillance cameras with offsite monitors, passengers would feel secure in all station areas, thereby expanding effective capacity.

3.1.1.3 Energy Efficiency

Energy efficiency would be incorporated into the lighting and electronically controlled signage for the station. The electrical system would include the extension of higher capacity electrical lines to the station area and the replacement of outdated electrical housing units as needed.

3.1.1.4 Integrity of Historical Resources and Vistas

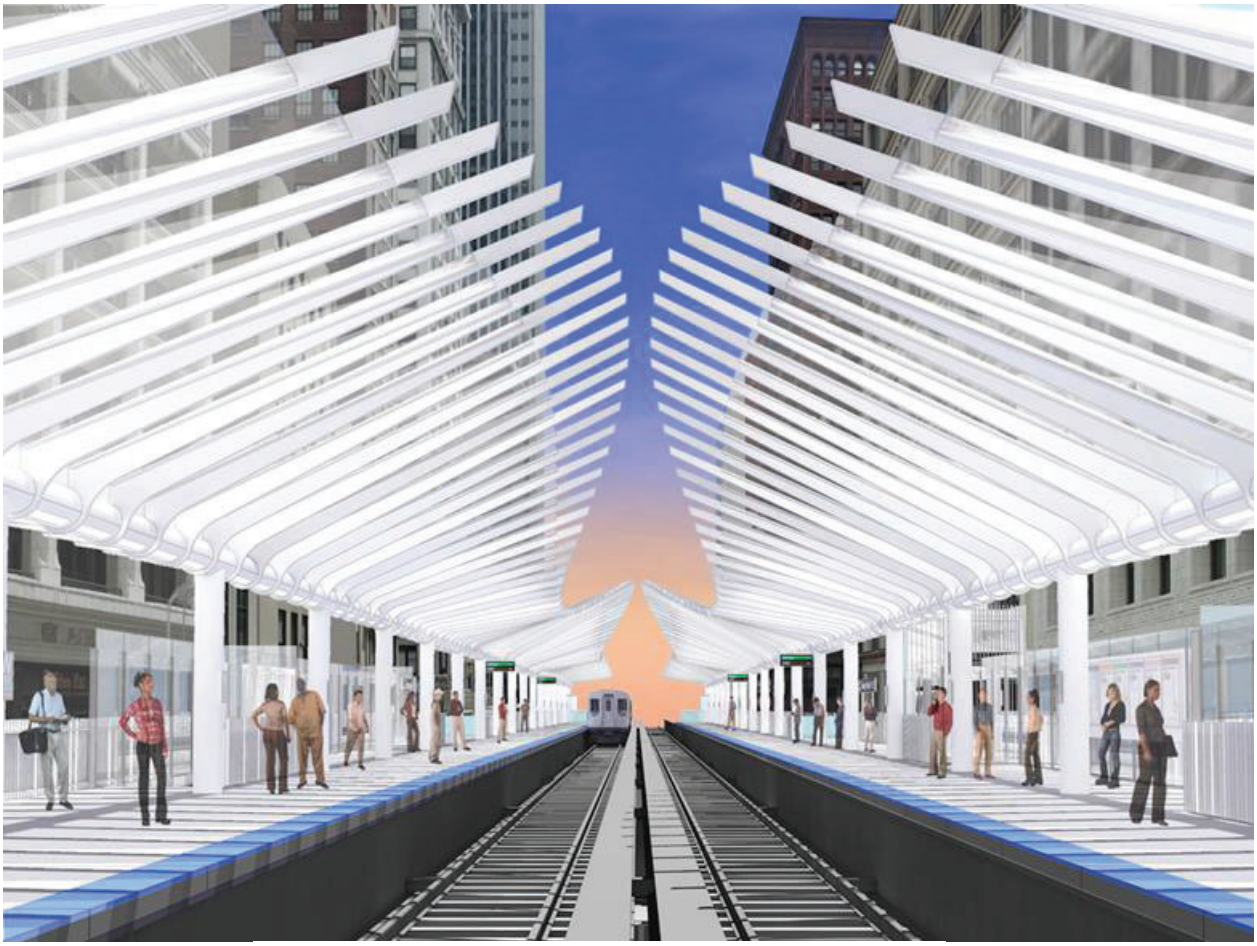
This plan would minimize alterations to the trestle of the Loop Elevated and have no impact on other historic buildings facing Wabash Avenue. It would offer clearer views of Millennium Park and improve street clearances by removing mezzanines over the East Randolph Street and East Madison Street intersections of Wabash and would provide less obstructed views of historic buildings facing Wabash.

3.1.2 Benefits

Anticipated benefits of the Preferred Alternative are:

- Complies with ADA requirements for access to all riders.
- Provides a modern design that would be less crowded for users, would attract riders and would be compatible with existing buildings.
- Increases station entrance capacity by 7.2% with 15 turnstiles versus the current combined total of 14 at the two stations it would replace.
- Improves security with a backup electrical system and a surveillance system for stairways, mezzanine, and platforms.
- Shortens travel times due to one stop rather than two between East Randolph Street and East Madison Street. According to the calculations in the CMAQ application for funding for the consolidated Washington/Wabash Station, it is anticipated that travel times would be improved by 30 to 50 seconds per day for about 66,300 daily passengers due to the elimination of one stopping sequence for each train.
- Improves air quality by eliminating and diverting car trips. Using a diversion rate of 4.71% of 12,107 daily boardings at the consolidated Washington/Wabash Station, the CMAQ application calculations show 356 round trips by car eliminated per day and 119 round trips by car diverted per day.
- Implements changes specified in local and regional plans.

Figure 6 – Platform View of Washington/Wabash Elevated Station (Preferred Alternative)



Source: *Chicago Department of Transportation (CDOT)*

Figure 7 – Overhead View of Washington/Wabash Elevated Station (Preferred Alternative)

Source: *Chicago Department of Transportation (CDOT)*

3.1.3 Drawbacks

Drawbacks of the Preferred Alternative are shown below. Please note that mitigation measures are discussed in Section 4 (Affected Environment, Environmental Consequences and Proposed Mitigation).

- Disrupts traffic during construction activities, including temporary street closures.
- Changes street-level entrance locations such that some users of the current Randolph/Wabash Station would have to walk up to 500 feet (1.2 blocks) further south to enter the new consolidated station.

3.2 Non-Preferred Alternative

Another design for a consolidated Washington/Wabash Station was prepared in 2006. It also addressed the inefficiencies identified at the existing Randolph/Wabash and Madison/Wabash Stations by incorporating wider platforms, elevators for improved accessibility, electrical and monitoring systems for security, and other modernization features. The primary difference was the re-use of the interior of the Haskell Building as the station house with a walkway leading to each platform.

Figure 8 depicts a cross section view of the Haskell Building interior under the Non-Preferred Alternative; additional illustrations of this alternative are included in Exhibit 2 of Appendix A.

3.2.1 Conceptual Design Elements

The conceptual design element that differentiated this approach from the Preferred Alternative was the connection of the retail spaces and interior station houses on the west and east sides of North Wabash Avenue with a pedestrian bridge.

The model for this was a Louis Sullivan-designed pedestrian bridge for transit station access that once stood at this location. One of the most influential architects representing the Chicago School of Architecture, Louis Sullivan is regarded as the "father of skyscrapers." An elevated two-story walkway would have replicated the original Louis Sullivan bridge. Decorative details would have been restored and missing decorative panels re-fabricated.

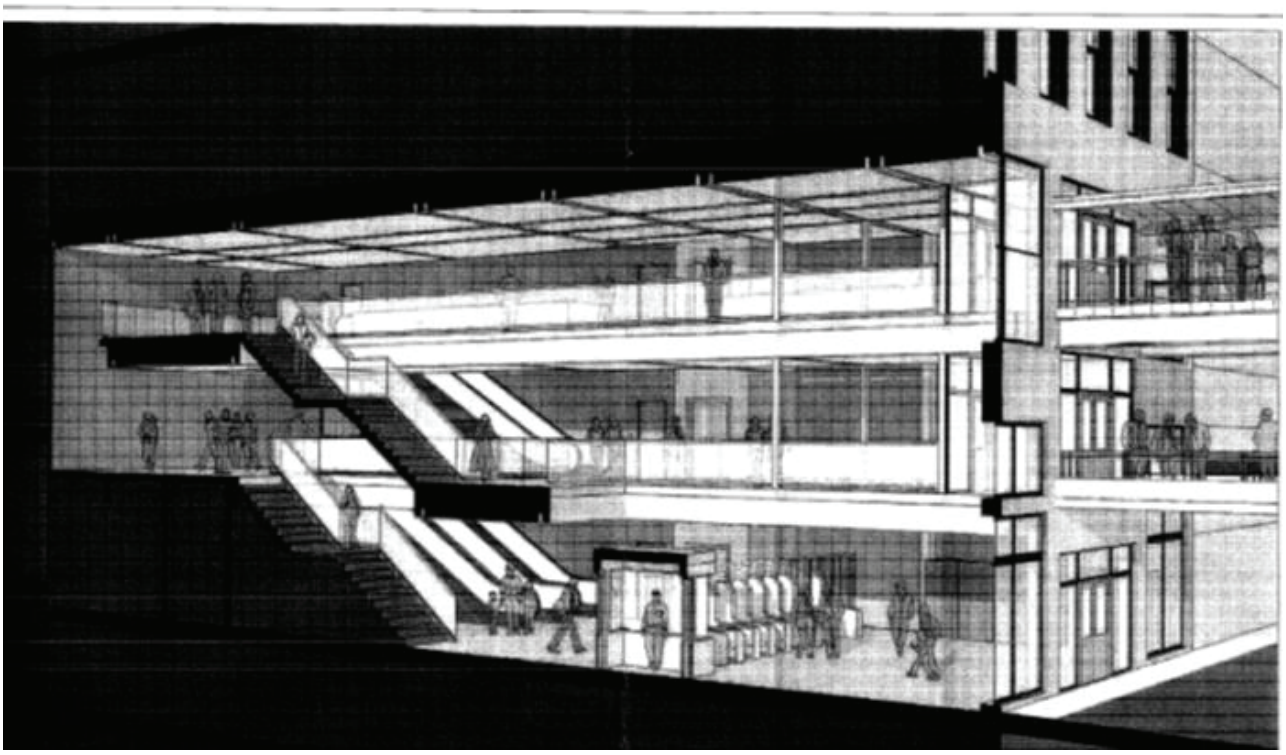
This alternative would have placed a station house inside the historic Haskell-Barker-Atwater Building at 22 South Wabash Avenue, framed by a restored Sullivan façade with all the windows in vision glass. (The Haskell Building had also been remodeled by Sullivan, in 1896.) The stairs, escalators, and an elevator would have been located indoors in the station house (comparable to the access to the Loop Elevated platforms at the Clark/Lake Station).

As with the Preferred Alternative, this plan would provide clearer views of Millennium Park, and improved street clearances by removing mezzanines over the East Randolph Street and East Madison Street intersections of Wabash.

3.2.2 Historic Preservation Consultation

Although the Sullivan-designed details and decorative panels would have been restored, the interior station house would have meant a notable change to the historic Haskell Building. Furthermore, the Haskell Building façades would have been obstructed from street level by the walkway. Due to the sensitive nature of such changes, CDOT arranged for IHPA staff to visit the site and review schematic drawings and hear their input prior to seeking any approvals for the *Project*.

Figure 8 – Conceptual Cross Section Perspective of the Haskell Building in the Non-Preferred Alternative Design



In a June 22, 2006 letter to CDOT, the SHPO observed that this alternative for the *Project* would partially demolish and wholly obscure a façade designed by Louis Sullivan and obscure several historic buildings across the street, "most notably the Jewelers' Building, also a Louis Sullivan design." SHPO closed the letter to CDOT recommending against the concept: "It is our decision that these are very grave adverse effects and we encourage the CTA to explore alternative locations for the Wabash Elevated Station." Copies of the June 22, 2006 letter and other CDOT-IHPA correspondence are provided in Appendix B.

While the design was intended to restore and replicate historic design elements, CDOT learned that historic preservation experts would have other concerns that would outweigh the intended benefits and would find the overall design concept unsatisfactory. Rather than further pursue a design concept unlikely to secure future approvals, CDOT abandoned the concept and made changes to the design so as to no longer include any use of the Haskell building. These changes ultimately lead to the Preferred Alternative.

3.2.3 Benefits

The anticipated benefits of the Non-Preferred Alternative would have been:

- Complies with ADA for access to all riders
- Improves security with modern electrical, monitoring, and public announcement systems.
- Shortens travel times due to one stop rather than two between Randolph Street and Madison Street.
- Improves air quality by eliminating and diverting car trips
- Provides unobstructed view of architectural, historical, and cultural resources from certain vantage points
- Reuses a historical building, replicates a historic pedestrian bridge and restores a Louis Sullivan façade.

3.2.4 Drawbacks

The anticipated drawbacks of the Non-Preferred Alternative would have been:

- Alters the interior of the Haskell Building substantially, raising concerns by historic preservation experts about the future historical integrity of the building.
- Partially demolishes an existing Louis Sullivan façade
- Obscures views of historical buildings across the street such as Jewelers Row, another Louis Sullivan design
- Lacks support from historic preservation experts
- Changes street-level entrance locations such that users of the current Randolph/Wabash station would have to walk up to 650 feet (1.3 blocks) further south to enter the consolidated station.

3.3 No Build Alternative

In the No Build Alternative, construction of the consolidated Washington/Wabash Station would not occur. CTA would conduct routine maintenance of the Randolph/Washington and Madison/Washington Stations as funds permit with occasional, piecemeal improvements when necessary for public safety.

The No Build Alternative would not address the needs identified in Section 2.3 (*Project* Needs and Objectives), or in local and regional plans for the Loop Elevated as described in Section 2.1.3 above and Section 4.2.1 below. Stations would continue to operate with the deficiencies identified by CDOT and CTA. No action would be taken to address the lack of ADA accessibility on the east leg of the Loop. This much used location adjacent to established retailers, a gateway to Michigan Avenue and its cultural and recreational resources, and proximity to office and hospitality complexes would still not be served adequately in terms of access, security, or operational efficiency.

In the long-term, costs would increase for the upkeep of these aging, obsolete structures, and the continued deterioration of the existing stations could eventually lead to demolition of one or both stations without adequate replacement.

3.3.1 Benefits

Benefits for the No Build Alternative are:

- Does not cause construction-related disruption
- Does not change station entrance locations

3.3.2 Drawbacks

The drawbacks for the No Build Alternative are:

- Fails to improve transit access for people with disabilities
- Fails to increase total turnstile capacity to accommodate ridership increases
- Makes little or no improvements to security on the platform and in the stairwells
- Does not improve travel times
- Does not adhere to local and regional plans calling for consolidating Randolph/Wabash and Madison/Wabash Stations
- Does not address deterioration of stations and risks their eventual closure

3.4 Evaluation of Alternatives

The conceptual designs for a consolidated station from 2006 and 2007 each provided improved accessibility, capacity, security, and efficiency. The difference was the placement of the station house. The Non-Preferred Alternative from 2006 located the station house inside the historic Haskell building; this design raised sufficient historic preservation concerns during early consultations with the SHPO at the IHPA that it was no longer considered feasible by CDOT.

Revisions lead to the development of the Preferred Alternative a year later. The 2007 concept maintained benefits of a modern consolidated station, but its use of an exterior station house in a mid-block mezzanine was designed specifically to avoid the historic preservation issues raised by the 2006 concept, while still improving vistas on Randolph and Madison Streets.

The No Build Alternative would not meet the *Project* Purpose and Need to resolve the current inefficiencies on the east leg of the Loop Elevated. Maintaining the status quo would not respond to the need to build a modern fully accessible, safe, and efficient consolidated facility.

4 AFFECTED ENVIRONMENT, ENVIRONMENTAL CONSEQUENCES AND PROPOSED MITIGATION

As part of the planning and design process for the Preferred Alternative, potential *Project* impacts and proposed mitigation have been considered. In this section, the findings for each of the resources of concern are concluded by a listing of potential negative and positive impacts and either proposed mitigation measures or a statement that such measures are not applicable.

4.1 Resources of No Concern Eliminated from Detailed Analysis

Since the *Project Area* is located within an urbanized setting that has been densely developed for over a century, the analysis of some resources was not applicable. These Resources of No Concern are: sole source aquifers, coastal zones, wild and scenic rivers, and prime and unique farmland. No detailed analysis was conducted for these resources.

4.2 Land Use, Zoning, Land Acquisition, and Relocation

The land use in the *Project* and *Study Areas* has historically been oriented for access to public transit, a prototype of Transit Oriented Development (TOD). Regional plans support the *Project* and zoning changes are not anticipated to occur as a result of the *Project*. There would also be no land acquisition, and therefore relocation as a result of this *Project* would not occur.

4.2.1 Consistency with Regional Land Use Plans

There are several regional and local land use/transportation plans that discuss the benefits of the *Project*. They are summarized below in chronological order. These plans confirm that this *Project* would be consistent with existing land use centered on public transit.

4.2.1.1 City of Chicago 1981 Master Plan for the Loop Elevated Rehabilitation and Historic Preservation

In 1978, the Loop Elevated was determined to be eligible to be included on the National Register of Historic Places, and the City of Chicago made a commitment to preserve this historic land use. The 1981 *Master Plan for the Loop Elevated Rehabilitation and Historic Preservation* (*1981 Loop Master Plan),* stated that the City and CTA must address "three vital issues":

> *"1) the physical integrity of the Loop Elevated trestle structure; 2) the siting of stations on the rehabilitated Loop El; and 3) the value of the Loop Elevated Structure as a site of historic importance."*

In regards to issue #2, it declared that "Stations sited and designed to best meet the demands of transit patrons are essential to the continued viability of the Loop Elevated."

Therefore, all Loop Elevated stations were evaluated based on five criteria: Pedestrian Accessibility, Ease of Transfer, Operational Efficiency, Joint Development, and Historical Integrity. The master plan then made station-specific recommendations, based on these evaluations. For the Randolph/Wabash and Madison/Wabash Stations, it recommended station consolidation, summarizing that:

> *…Since the original stations have both been altered substantially, their historical significance has been diminished. The track-level fare collection facilities at the Randolph/Wabash Station are*

inefficient… The two stations are located such that they could be combined into one, which could provide efficient and effective service at lower operation costs [Page III-39]

The combination of two stops into one can lead to substantial financial savings due to decreased car stops (acceleration cost), the need for fewer ticket agents, and less frequent maintenance. …These factors make the proposed [Washington/Wabash] station location preferable to the retention of the two existing stations. [Page III-41]

4.2.1.2 The Chicago Central Area Action Plan

Released in 2009, The Central Area Action Plan (CAAP) contains information intended to encourage the implementation of policies and projects essential for effective functioning, growth and quality of life in Chicago's downtown core.

The CAAP builds upon the vision for the central area articulated in the 2003 Central Area Plan. In addition to including cost estimates for public improvement projects and an implementation timeline, it represents input from community stakeholders and technical expertise from a steering committee, task forces, city staff and planners. It was adopted by the Chicago Plan Commission on August 20, 2009.

The transportation chapter states six goals, the first of which is "Improve Transit in the Central Area." Among its recommendations are completion of nine modernized CTA stations and four in-fill stations. The *Project* is among the nine modernizations and is currently on schedule to become the third of those completed following Grand/State and Clark/Division.

4.2.1.3 The CMAP GO TO 2040 Comprehensive Regional Plan

The Chicago Metropolitan Agency for Planning (CMAP) is the designated Metropolitan Planning Organization (MPO) for Northeastern Illinois. Its CMAP's GO TO 2040 Comprehensive Regional Plan (CMAP, October 2010) integrates land use and transportation policy objectives.

One top level recommendation is to "Invest strategically in transportation." On page 272, GO TO 2040 calls for spending $41.8 billion over 30 years on projects that "Bring the system to a state of good repair and those that enhance and modernize." It states that "Projects of this type are not identified individually in the plan, but are identified and implemented through the region's Transportation Improvement Program." Therefore, because the "Washington/Wabash Consolidated Station" is included in the CMAP Transportation Improvement Program (TIP) with ID number 01-12-0008, it is also incorporated by reference into GO TO 2040. A printout of the TIP listing is included in Appendix C.

4.2.1.4 The Chicago Forward CDOT Action Agenda

The Chicago Forward Department of Transportation Action Agenda (CDOT, May 2012) lists among its action items the construction of four new CTA stations. One sub-item specifies the design and construction of the Washington/Wabash Station on the CTA Loop Elevated.

The 2013 Update to Chicago Forward (CDOT, October 2013) has a two-page feature on "New CTA Stations" that includes the recently completed Morgan Station, the Cermak-McCormick Place Station under construction, and progress toward the Washington/Wabash Station *Project*.

4.2.2 Zoning

The *Project Area* is generally zoned "DX-16," which is "Downtown Mixed-Use" with a maximum 16 Floor/Area Ratio (see Figure 9, Zoning Map of *Project Area* and Vicinity). Although Figure 9 shows that Planned Developments 476 and 787 include portions of the current Randolph/Wabash Station, it is only because zoning changes for a building are drawn to the centerline of adjacent streets; the enacting ordinances for these planned developments make no reference to the station.

According to the city's zoning code, DX zoning "is primarily intended to accommodate office, commercial, public, institutional and residential development." The land uses in the *Project Area* are predominantly commercial for retail and service businesses, and institutional for universities and public services. There are also a few adjacent high-rise residential uses.

Transit stations qualify for the "Utilities and Services, Major" usage category, which is designated a "special use" in the DX zone (and almost all other zoning categories in Chicago). Given the nature of the *Project*, no difficulty is expected in securing special use approval. There are no changes needed for the underlying zoning as a result of this *Project*.

4.2.3 Relocation

The City of Chicago would not acquire land for this *Project*; therefore relocation of businesses or residences would not occur.

4.2.4 Summary

Impacts are not expected in this resource category:

- Construction of a consolidated Washington/Wabash Station is consistent with local and regional land use and transportation plans.
- The *Project* is not expected to trigger changes in land use.
- Zoning would not change and zoning adjustments would not be requested.
- The City of Chicago would not be acquiring land for this *Project*.

Therefore, mitigation measures are not applicable to Land Use, Zoning, Land Acquisition, and Relocation.

4.3 Social and Economic Considerations

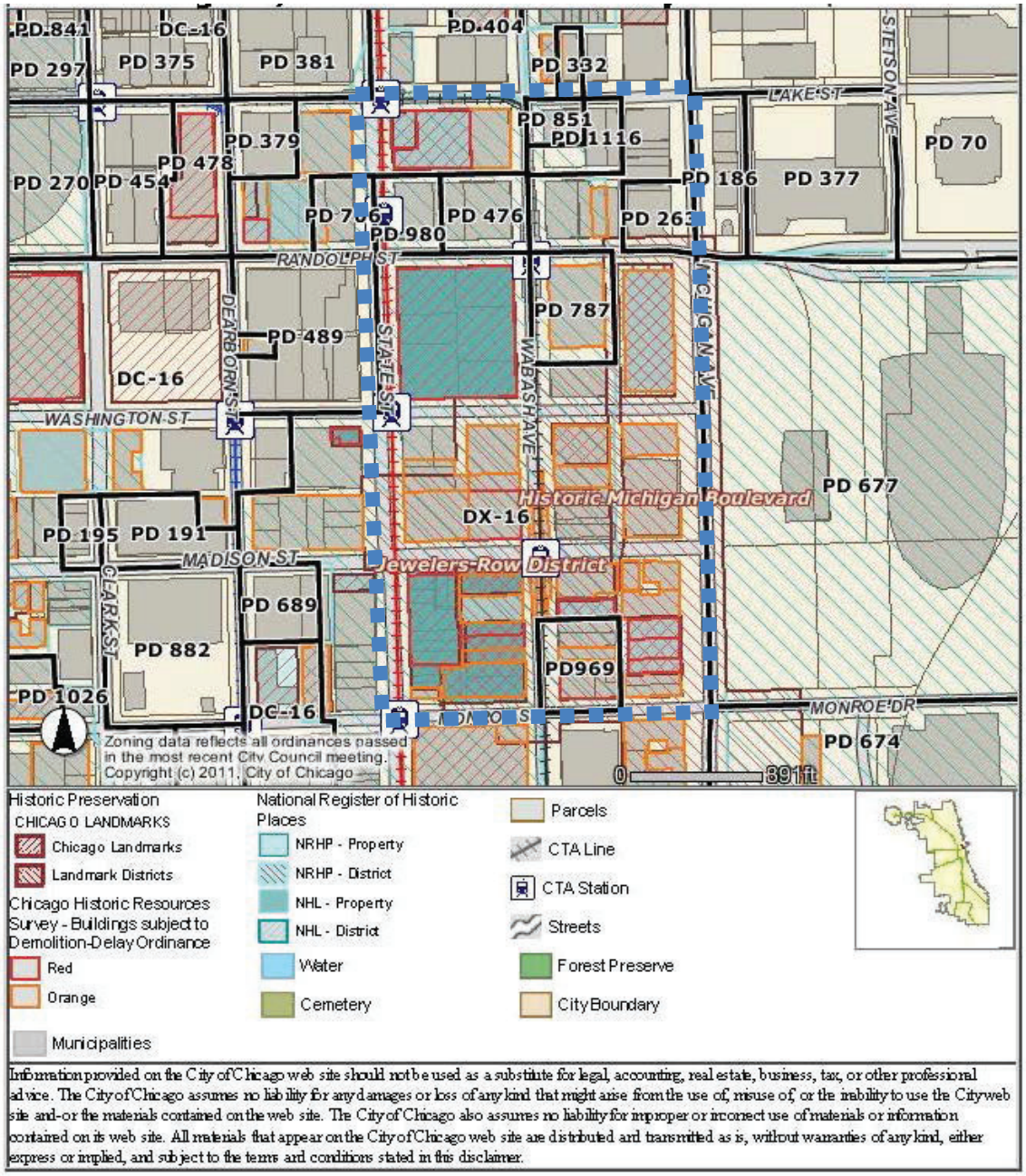
Social and economic considerations were studied in terms of impacts from the *Project*. As noted above in Section 4.2.2 (Zoning), there are no anticipated long term changes in commercial, institutional, or residential land uses for the area. Therefore, negative impacts to neighborhood continuity are not expected. Findings, impacts, and mitigation for neighborhood continuity and community cohesion, and neighborhood economic structure are noted in the sub sections below.

4.3.1 Neighborhood Continuity and Community Cohesion

Section 4.2.2 notes that residential land use surrounding the proposed Washington/Wabash Station is minimal. The *Study Area* and vicinity are comprised primarily of retail and service-oriented businesses as well as educational and cultural institutions. Although there are some high-rise residential buildings with commercial and office units at street level, there is no residential neighborhood in the traditional sense. There would be no long term change in land use initiated by the *Project*; therefore impacts to neighborhood continuity and community cohesion are not anticipated.

Figure 9 – Zoning Map of *Project Area* and Vicinity

(*Study Area* is indicated by blue dashed lines)



Retrieved from cityofchicago.org/Zoning, 11/25/2013

4.3.2 Neighborhood Economic Fabric

The *Project* would not result in any land acquisition. Therefore, a negative change in the neighborhood's economic structure would not be anticipated. Other than the temporary and minor traffic and parking impacts detailed in Section 4.17, current businesses would not be affected because workers, customers, and visitors would continue to use the CTA lines along North and South Wabash Avenue and street level access to patronize local stores and restaurants. Upon completion of the *Project*, improved access, to and from the new station may increase visitors to the area. It is anticipated that the overall impacts to the economy of the surrounding area would be positive.

4.3.3 Summary

Areas of potential impact or concern are:

- No negative impacts are expected regarding neighborhood continuity and community cohesion.
- No negative impacts are expected on the economic fabric of the *Project* or *Study Areas* because there are no land acquisitions or changes in land uses.
- Retail, service, and institutional activities may experience temporary, construction-related access impacts from the traffic and parking impacts detailed in Section 4.17.
- A modern station would be anticipated to have an overall positive effect on the economy of the area.

Permanent mitigation measures are not applicable for this resource category. The measures discussed in the traffic and parking section (Section 4.17) of this EA would also serve to mitigate any short term construction-related impacts.

4.4 Environmental Justice

The purpose of an Environmental Justice evaluation is to identify whether a project would have disproportionately high and adverse impacts on minority and/or low-income populations. This Environmental Justice Section has been prepared in accordance with federal Executive Order No. 12,898.

4.4.1 Definitions of "Minority" and "Low-Income" for this analysis

U.S. Bureau of the Census data are used to determine the numbers of low-income and minority populations within proximity of the *Project* as defined in FTA Circular 4703.1 (2012) on Environmental Justice.

"Minority" is defined as anyone who is 1) American Indian or Alaska Native, 2) Asian, 3) Black or African American, or 4) Hispanic or Latino, or 5) Native Hawaiian or Other Pacific Islander. "Minority population" means any readily identifiable group of minority persons who live in geographic proximity.

The circular also indicates that the FTA uses poverty thresholds from the US Department of Health and Human Services to define a "low-income population" as any readily-identifiable group of low-income persons who live in geographic proximity.

4.4.2 Applicable Census Data for *Project Area* and City of Chicago

As noted above in Section 4.2.2 (Zoning), the *Study Area* is located in a "Downtown Mixed-Use" zoning area (see Figure 9, Zoning Map). The land uses in the *Study Area* include retail, several universities, student housing, and high rise, high-end residential condominium and rental units. The Project Area and Study Area lie within Census tracts 3201 and 3204 (see Figure 10). Since the CTA lines that operate on the Loop Elevated serve a

ridership that encompasses a large metropolitan area, the low-income and minority populations statistics considered for this analysis were for the *Study Area* as well for the City of Chicago.

Due to the unique characteristics of the *Study Area*, the percentages of minority and low-income populations residing in these tracts are less than in the City as a whole. In tracts 3201 and 3204, respectively, 8.3% and 4.6% of the population have incomes below the poverty line and 31.4% and 29.3% are minorities. In the entire City of Chicago, the population below poverty level is 21.4%. and minority population is 68% (See Table 2). Full Census data regarding minority populations is included in Appendix C.

Based on these statistics, the low-income and minority populations potentially affected are not the residents of the *Study Area,* but those across the city who travel through the *Project Area* and/or to the *Study Area.* The new station would provide an improved transit experience to riders traveling to local jobs, public service centers, public institutions, schools, residences, shopping and tourist destinations. This would benefit all populations within Chicago traveling to the *Study Area*, including minority and low-income populations.

4.4.3 Determination of Environmental Justice Impacts

Based on the analyses conducted for this EA, and the demographic characteristics of the *Study Area* and of the City of Chicago, it was determined that this *Project* would not disconnect any residential areas, would not serve as a physical barrier, and would not interrupt community services. Further, no adverse long-term environmental impacts are anticipated as a result of the *Project*.

Therefore, the *Project* would not result in a disproportionately high and adverse impact on minority or low-income populations.

4.4.4 Environmental Justice Considerations in Outreach Planning

CDOT and CTA will consider minority and low-income populations in planning its outreach efforts to make all CTA customers aware of the *Project* and its construction schedule. In addition to coordinating with the local Alderman's office and publishing online notifications, CDOT and CTA will post updates throughout the CTA rapid transit system. They will also place notifications in ethnic and local newspapers and directly contact community organizations serving minority populations, such as the Rainbow PUSH Coalition, National Council of La Raza, and the Chicago Minority Business Development Council. See Section 5 (Public Involvement and Public Coordination) for additional outreach details.

4.4.5 Summary

No negative impacts on minority and low-income populations residing in the *Study Area* are anticipated. It is expected that the addition of a fully accessible facility, with improved security and safety features would be a benefit to all customers, including minority and low-income populations, and attract a greater diversity of riders. An improved station may encourage a greater number of visitors of diverse economic, racial, and ethnic backgrounds to take advantage of the cultural and recreational resources nearby.

Mitigation measures for Environmental Justice issues are not required. Minority and low-income populations will be given specific consideration by incorporating specific outreach efforts to community groups and service organizations that assist these populations during the overall effort to keep all riders informed on the progress of the *Project*, construction activities, and staging schedules.

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Figure 10 – Census Tracts incorporating the *Study Area*

(*Study Area* is indicated by green dashed lines, main station entrance by blue dot)

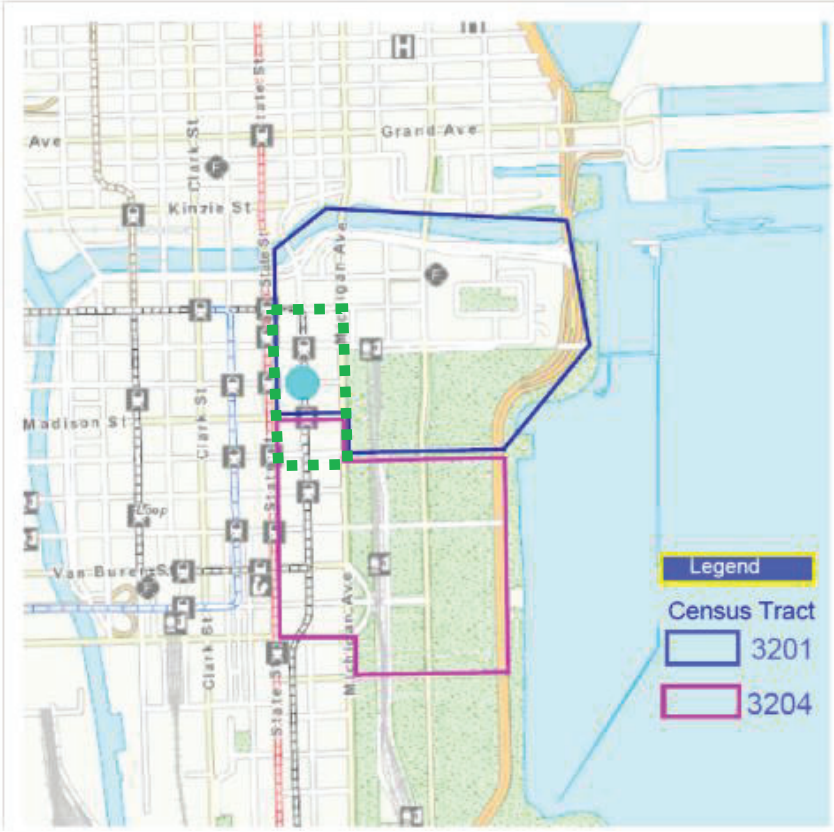


Table 2 – Population Characteristics related to Environmental Justice

	City of Chicago	Census Tract 3201	Census Tract 3204
Total Population	2,695,598	10,848	2,518
% Below Poverty Threshold	21.40%	8.30%	4.60%
% Minority Population	68%	31.40%	29.30%

SOURCE: 2007-2011 American Community Survey 5-Year Estimates

4.5 Historical and Archeological Resources

Research was conducted to determine the presence of historical and archeological resources in the *Project* and *Study Areas*. This section describes resources that are present and discusses Section 106 consultations with the State Historic Preservation Officer (SHPO) at the Illinois Historic Preservation Agency (IHPA).

4.5.1 Existing Local Architectural Historical Resources and Impacts

Table 3 lists buildings and districts in the *Study Area* that have one or more major historic designations: National Historic Landmark (NHL), National Register of Historic Places (NHRP), Chicago Landmark Building (CLB), and Chicago Landmark District (CLD). There are three districts and eleven buildings in the *Study Area* that qualify for at least one of these historic registries with buildings dating back as far as 1878. (The Zoning Map in Figure 9 includes layers outlining historic buildings and districts while Figure 11 below shows locations and names of noteworthy historic buildings in the overall Central Area, with the *Study Area* outlined for reference.)

Seven of the buildings in Table 3 border the *Project Area*, and four of the seven are on the National Register of Historic Places (NRHP). At the southwest corner of State and Madison is the Carson, Pirie, Scott and Company Building at 1 South State Street (now known as the "Sullivan Center" and occupied by a Target store and other tenants.) The Marshall Field Company Store (now Macy's) is at 111 North State Street. Across the Street from each other are the Silversmith and Jeweler's Buildings. Jewelers Row is along North Wabash Avenue between Madison Street and Washington Street. The NRHP Loop Historic Retail District includes these buildings and effectively all of those facing the *Study Area*.

Appendix B includes a more detailed table that itemizes each building in or bordering the *Study Area*, and lists date of construction, date and type of historic designation, inclusion in designated historic districts, and whether the building is subject to a demolition delay due to the Chicago Historic Resources Survey. Note that most buildings are at least 50 years old, even if not under a historic designation.

In addition to architectural landmarks in the vicinity of the *Project*, the *Project* itself is located on the Loop Elevated (once known as the Union Loop). Built in the 1890's, it is a historic structure eligible for NRHP designation. Its preservation continues to be a priority for public agency planners, engineers, and architects.

Under the Preferred Alternative, there is no direct physical impact to any of the historic structures described above, and as illustrated in Appendix A, the design would improve the visibility of these buildings. Therefore, there are no anticipated permanent impacts on any of the historic structures listed in Table 3. While no construction-related impacts are anticipated either, CDOT would take precautions during demolition and construction to assure that there are no unintended negative impacts on nearby historic buildings.

4.5.2 Section 106 Consultation

Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f) requires federal agencies to consider the effects on historic properties of projects they carry out, approve, or fund. (The details of how agencies address this requirement are found in federal regulations 36 CFR Part 800).

The *Project* would be primarily funded with an FTA grant, and thus Section 106 must be considered. Additionally, the Advisory Council on Historic Preservation (ACHP), an independent federal agency, must be provided an opportunity to comment on such projects prior to the agency's decision on them.

Section 106 coordination on this *Project* began in 1981 with review of the conceptual plan documented in the *1981 Loop Master Plan*, and included ACHP commentary. The subsections below describe the Section 106 coordination activities that have occurred to date.

Table 3 – Formally Designated Historic Districts and Buildings in *Project Area* and *Study Area*

Name	Location	Designations (See below)	Year Constructed
Historic Districts partially in *Project Area/Study Area*			
Loop Retail Historic District	Area roughly bounded by Lake St, alley east of Wabash Ave, Congress Pkwy & State St)	NRHP (1998)	Various
Jewelers Row District	Wabash Ave, generally between E. Washington St and E Monroe St	CLD (2003)	1872-1941
Historic Michigan Boulevard District	Michigan Ave between E. Randolph St and E. 11th St	CLD (2002)	Various
Historic Buildings in/bordering *Project Area*			
Marshall Field and Company Building (a.k.a. "Marshall Field Company Store" now occupied by Macy's)	101-137 N State St, (Block bounded by Wabash Ave, Washington St, State St, and Randolph St, incl. 29 E Randolph St, 122 N Wabash Ave & 28 E Washington St)	NRHP (1978) NHL (1978) CLB (2005)	1914
Carson Pirie Scott & Co. Building (now part of Sullivan Center, and occupied by Target)	1 S State St (Block bounded by Wabash Ave, Madison St, State St, and Monroe St, excl. 39 S State St. and Silversmith Building)**	NRHP (1970) NHL (1975) CLB (1970)	1905
Haskell, Barker and Atwater Buildings (now part of Sullivan Center)	18, 22 and 28 S Wabash Ave	CLB (1996)**	1875-1877, 1896
Heyworth Building	29 E Madison St	CLB (2000)**	1904
Silversmith Building (Now Crowne Plaza Hotel)	10-14 S Wabash Ave	NRHP (1997)	1896
Jewelers Building	15-19 S Wabash Ave	NRHP (1974) CLB (1981)	1878
Pittsfield Building	55 E Washington St	CLB (1977)	1927
Historic Buildings in *Study Area*			
Page Brothers Building Cast Iron Front	177-191 N State St	NRHP (1975) CLB (1983)	1921
Balaban & Katz Chicago Theater	175 N State St	NRHP (1979) CLB (1983)	1921
Chicago Public Library (now Chicago Cultural Center)	78 E Washington St (also 122 N Michigan Ave)	NRHP (1972) CLB (1976)	1897
Gage Group (Gage, Keith and Ascher Buildings)	18, 24, and 30 S Michigan Ave	NRHP (1985) CLB (1976)	1898

NRHP National Register of Historic Properties
NHL National Historic Landmark
CLB City of Chicago Historic Landmark Building
CLD City of Chicago Historic Landmark District

** Haskell, Barker, Atwater and Heyworth were considered part of the Carson Pirie Scott Building for NRHP/NHL/CLB designation in the 1970's, but later given an independent designation as CLB.

Sources:
https://gisapps.cityofchicago.org/zoning/viewframe.htm (retrieved 11/14/13)
http://www.illinois.gov/ihpa/Preserve/Pages/NHL.aspx (retrieved 11/14/13)
http://www.cityofchicago.org/content/dam/city/depts/zlup/Historic_Preservation/Publications/Chicago_Landmark_Address_List_Oct2013.pdf
http://webapps.cityofchicago.org/landmarksweb/web/listings.htm#P (retrieved 11/14/13)
http://www.cityofchicago.org/content/dam/city/depts/zlup/Historic_Preservation/Publications/National_Register_List_Jul2012.pdf
http://www.cityofchicago.org/city/en/dataset/landmark_districts.html (retrieved 11/14/13)

Figure 11 – Map of National Register of Historic Places sites in *Study Area* and downtown Chicago

(*Study Area* is indicated by solid blue lines)

National Park Service

Chicago: A National Register of Historic Places Travel Itinerary

HISTORIC PLACES IN CHICAGO

This map introduces you to more than two dozen of Chicago's historic buildings. Each numbered dot connects you to a photograph and a brief description of the place it identifies. The 16 that are in or near the Loop appear on the street map; the other nine are farther south. You can also view a list of all 25 sites.

Scroll down to the bottom of this page to visit the Bing map and get directions to all the sites in this itinerary.

1. Albert F. Madlener House
2. James Charnley House
3. Montgomery Ward and Company Building
4. Chicago Avenue Water Tower and Pumping Station
5. Tree Studio Buildings and Annexes
6. Reid Murdoch Building
7. Marshall Field Building
8. Chicago Public Library (now the Chicago Cultural Center)
9. Carson, Pirie, Scott and Company Building
10. The Rookery
11. Marquette Building
12. Monadnock Block
13. Old Colony Buildings
14. Manhattan Building
15. Auditorium Building

4.5.2.1 Historic Designation Eligibility of the Loop Elevated

During the 1970's, the Loop Elevated was in a poor state of repair, and planning had been underway for a Franklin Street Subway and Monroe Distributor Subway that would have replaced – and lead to the demolition of - the Loop Elevated.

FTA's predecessor, the Urban Mass Transportation Administration (UMTA), conducted an environmental impact statement for the Franklin Street Subway. During the Section 106 process for that project UMTA requested an opinion on the historic status of the Loop Elevated from Dr. William Murtaugh, keeper of the National Register of Historic Places. In a July 28, 1978 letter, Dr. Murtaugh found the "Chicago Union Loop Elevated Structure" to be eligible for the NRHP.

In providing this opinion, Dr. Murtaugh cited NRHP criteria "A" (association with events that have made a significant contribution to broad patterns in our history) and "C" (embodiment of distinctive characteristics of a type, period, or method of construction; representation of work of a master; possession of high artistic values; or representation of a significant and distinguishable entity whose components may lack individual distinction).

The Loop Elevated has never been added to the NRHP itself, but the "Loop Retail Historic District" was added to the register in 1998. The District generally includes buildings between State Street and the Wabash Leg of the Loop Elevated. A column in the historic buildings table in Appendix B identifies which pre-1965 buildings in the *Study Area* are in this NRHP district.

4.5.2.2 Master Plan for the Loop Elevated

The City and CTA ultimately chose not to pursue the Franklin Avenue Subway Project, and instead began evaluations to rehabilitate the Loop Elevated. By 1981, the City and CTA were seeking to use federal funds (among those reprogrammed from the cancelled Crosstown Expressway) to rehabilitate the Loop Elevated structure and some of its stations. To document the proposed project for federal approvals, the City of Chicago prepared the *Master Plan for the Loop Elevated Rehabilitation and Historic Preservation* (*1981 Loop Master Plan).* Excerpts from this document are in Appendix B.

As part of the *1981 Loop Master Plan* planning process, the City of Chicago and UMTA consulted with the SHPO concerning effects on resources either on or eligible for the NRHP from the projects described in the master plan (which included the Washington/Wabash Loop Elevated Station *Project*).

The 1981 Master Plan observed that the history of Chicago's Loop Elevated has had repeated alterations of its administrative and physical structure to meet the city's changing transportation needs. Without such changes, the Loop Elevated would probably have ceased to be a functioning part of Chicago's transportation system. Changes made to it over time have altered many of its original features.

In reviewing each station individually, the *1981 Loop Master Plan* found that most stations had been greatly altered and bear little resemblance to their original condition. Randolph/Wabash Station and Madison/Wabash Station had each been modified on a piecemeal basis over the decades and lacked historic integrity. Quincy Station and portions of the Adams/Wabash Station were considered to better exemplify the history of Loop Elevated stations and were prioritized for preservation. However, all stations affected by the *Project* were deserving of documentation for historic records.

The 1981 Master Plan argued that the construction of new, more efficient stations in better suited locations would mitigate the overall effects of work on the Loop Elevated because of the altered and deteriorated condition and appearance of the individual stations. Construction of a new station would not alter the overall

integrity of the Loop Elevated. It further reasoned that the present location of existing stations inhibits the viewing of other National Register properties located throughout Chicago's Business District.

4.5.2.3 Historic Effects Determination for Projects in the 1981 Loop Master Plan

On October 7, 1981 UMTA issued a Section 106 "Determination of No Adverse Effect" to permit the use of federal funds for rehabilitation of the Loop Elevated projects defined in the *1981 Loop Master Plan,* specifically "upgrading the trestle and restoring, rehabilitating, and reconstructing certain stations to maintain the structural integrity of the structure and to respond to changing transportation needs in the Central Area of Chicago." The ACHP concurred with this finding on the same date. These documents were included in the final version of the *1981 Loop Master Plan* document.

The supporting document by UMTA itemized the projects, and included an explicit description of the *Project* under consideration in this EA: "The Washington-Madison/Wabash Station will replace the existing Randolph/Wabash and Madison/Wabash stations. Consolidation of these stations at one mid-block location will improve operating efficiency while maintaining easy transfer to bus, subway, and commuter rail."

In its reasoning for the "Inapplicability for the Criteria of Adverse Effect", the supporting document stated that:

> "Station removal and reconstruction on the Loop El is not considered to be an adverse effect. Historically, it was not the stations, but the encircling layout of the structure itself around the downtown core that embodied historical significance. As noted in the Department of the Interior's determination of eligibility for the National Register (July, 1978), the Loop El Structure is important as a historic transportation facility as well as for its influence on the growth and development of downtown Chicago. As detailed in the City's Master Plan for the Loop El rehabilitation, original station locations have changed in some cases to adapt to changing needs. Stations have periodically been removed due to lack of ridership. Moreover the fabric of the original stations has been altered through periodic maintenance over the years. In comparison, the trestle has remained relatively unchanged with its intricate web of supporting members still intact. The best hope, then, of preserving the Loop El as a viable transportation facility is to continue the trend of allowing stations to change in response to changing downtown developments."

The letter also stated that the finding was based on the "Conditions for a Determination of No Adverse Effect for the Chicago Loop Elevated Rehabilitation Project" as signed in October 1981 by the City of Chicago, CTA, and SHPO.

This conditions document stated that: "With the exception of Quincy/Wells and Wabash/Adams, all existing stations on the Loop Elevated structure may be removed in accordance with the 1981 Master Plan. Prior to demolition of any structure, the City of Chicago and/or CTA shall contact National Architectural and Engineering Record (NAER) (National Park Service, US Department of Interior) to determine the level of documentation required. After documentation is accepted by NAER, the Advisory Council on Historic Preservation must be notified of the NAER acceptance prior to demolition." [The current name of this National Park Service documentation program is the Historic American Engineering Record (HAER), see discussion below.] The conditions document further specified that the NAER documentation be archived with the Chicago Historical Society, CTA, and Chicago Public Library. Finally, the conditions document stated that the SHPO will be given the opportunity to review final design plans for station construction prior to implementation.

4.5.2.4 Historic American Engineering Record Documentation

The Historic American Engineering Record (HAER) was established in 1969 by the National Park Service, the American Society of Civil Engineers and the Library of Congress to document historic sites and structures related to engineering and industry. HAER documents were previously filed in response to the documentation requirements described in Section 4.5.2.3 above for the Loop Elevated (IL-1 / ILL-16-CHIG-108), Randolph/Wabash Station Elevated (IL-1D / ILL-16-CHIG-108D), and Madison/Wabash Station Elevated (IL-1I / ILL-16-CHIG-108I). These documents provide well researched histories of these structures and their evolution. This history is summarized below, but the full HAER documentation is available in Appendix B.

Built in 1896-1897 as the Union Elevated Railroad, the Loop Elevated is the oldest elevated transit structure in the United States and one of the few Elevated Railways still operating in America. It is important to the history of Chicago and its downtown, as the downtown area derived its name from this property. [Although there was a "Loop" of trolley lines downtown prior to 1897, it is the Loop Elevated that was prominent when community areas were formally named in the 1920s]. Subsequent HAER information states the importance of this elevated transit system in industrial archeology. The Loop Elevated was designed by John Alexander Low Waddell, an engineer known for his bridge design. Financier Charles Yerkes acquired the rights of way to build this composite of steel and wood. "Historically the Loop Elevated defined the most prestigious locations for office buildings…" This record also lists the many changes to platforms, stations, and transfer bridges, demolitions and renovations of stations between 1903 and 1975.

The HAER documentation for Randolph/Wabash Station lists the alterations and additions for the station. In 1919, "platform extensions doubled the carrying capacity of the station and allowed larger trains." In 1916-1930, "Marshall Field & Company planned a direct access staircase." In 1956, "the entire west station house was replaced with a structure completely different in both design and construction from that which had been designed by Waddell." In 1967 the east platform station house was demolished.

The HAER documentation for Madison/Wabash Station also lists its alterations and additions. In 1903, platform extensions were added. In 1908, there were "modifications of the interior of the east platform station house with the removal of the north ticket booth and new handrails." In 1967, "system wide modernization replaced multi-paned glass windows with corrugated fiberglass windbreaks. The east station house was demolished."

4.5.2.5 Activities on the Loop Elevated since the 1981 Master Plan

In the 16 years that followed the publication of *1981 Loop Master Plan*, many of the station projects specified in the Plan were achieved:

- November 1985-February 1988: Historic restoration of Quincy Station
- 1987-1989: Adams/Wabash Station renovated, combining restoration of historic elements (e.g., railings and transfer bridge, and modernization of other elements (e.g., platform areas over Adams)
- 1988-1992: Clark/Lake Station reconstructed and relocated westward - On March 23, 1992, the original station houses closed and access to the platform moved to entrances built into the State of Illinois Center and the 203 N. LaSalle building. These entrances had opened in 1989 and 1991 to provide access to the "Lake Transfer" subway station on the route now known as the Blue Line. Upon completion of this work, the subway stop became part of the Clark/Lake Station and direct "paid area" transfers between the elevated and this subway became possible.
- January 1994: Madison/Wells Station closed for demolition in preparation for Washington/Wells Station construction

- July 1995: A consolidated Washington/Wells Station opens, Randolph/Wells Station permanently closes.
- June 1997: Harold Washington Library-State/Van Buren Station opens, replacing a station that had been closed in 1973 and demolished in 1975

The only station-related projects in the *1981 Loop Master Plan* that have not yet been completed are this *Project,* the State/Lake Station, and the LaSalle/Van Buren Station. The State/Lake Station Project is currently in the preliminary design process; in November 2013 CMAP programmed CMAQ funds to allow CDOT to start Phase II (Final) Engineering as early as 2014.

4.5.2.6 Evaluations of Washington/Wabash Loop Elevated Station in the 21st Century

As detailed in Section 3.2 above ("Non-Preferred Alternative"), CDOT developed an initial design for the *Project* in 2006 that would have incorporated a station house in the Haskell Building. Based in part on historic preservation concerns raised by the SHPO, CDOT then revised this initial design to the one that became the Preferred Alternative.

In May of 2007, CDOT provided SHPO design drawings of this new conceptual design for review. In its cover letter, CDOT emphasized features of the new design:

- *…The new station will be entirely self-contained within the Wabash Avenue corridor with no connection to adjacent buildings*

- *…A glass canopy will cover the north end of the platform. The concept for the canopy design is to allow for minimum structure and maximum transparency to allow for clear views of the adjacent historic facades and minimize impact of the new station on the street corridor.*

- *…View corridors down Randolph and Madison Streets will provide a clearer view to Millennium Park with the removal of station houses over the intersections.*

- *…The replacement of two stations with one that is more transparent will improve the overall environment of the Wabash streetscape*

In August 2007, following review of the plans, SHPO concurred in a Section 106 finding of no adverse effect pursuant to 36 CFR 800 with the following condition: "the project design is finalized in consultation with our office to ensure adherence to the Standards (Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.)"

In 2013, FTA reviewed the Section 106 coordination activities that have occurred to date on the *Project.* FTA has determined that the HAER documentation described above in Section 4.5.2.4 satisfies the condition for NAER documentation outlined in the October 7, 1981 UMTA Section 106 "Determination of No Adverse Effect" letter (described in Section 4.5.2.3 above).

The only remaining Section 106 coordination activity yet to occur for the *Project* is the requirement to provide the SHPO the opportunity to review final design plans for station construction prior to implementation, as described above (see Section 4.5.2.3). FTA and CDOT will continue to coordinate activities as the *Project* moves into final design. The SHPO will be given an opportunity to review the final design plans once they are prepared.

No additional Section 106 coordination activities will be required for this *Project*. Copies of the Section 106-related SHPO correspondence are included in Appendix B.

4.5.3 Archaeological Resources

No archaeological artifacts or remains have been identified within the *Project Area* during the periodic consultations since 1981 with SHPO and ACHP. Due to prior excavation in the vicinity for other structures, roads, and urban infrastructure, intact archaeological remains or artifacts are not expected to be present. Therefore, the proposed *Project* is not anticipated to impact any archaeological resources.

4.5.4 Summary of Impacts and Mitigation Measures

Anticipated impacts are listed below:

- Preservation of the Loop Elevated as a historic structure depends on the long-term viability of its transit operations, and thus on well maintained, modernized, efficient stations. The consolidation of the Randolph/Wabash and Madison/Wabash Stations promotes this long-term viability, while at the same time respects and supports the adopted historic preservation plans for the Loop Elevated. Consequently, the *Project* would have no adverse historic preservation effects on the Loop Elevated.
- There are over a dozen formally designated historic buildings and districts in the *Study Area*. The new station would not alter any adjacent historic buildings. The replacement of two visually imposing structures with a single station of a more open design would improve the visibility, and potentially the appreciation, of these buildings.

Mitigation measures would be implemented as follows:

- CDOT and FTA will consult with the SHPO to allow the opportunity to review the final design for adherence with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.
- Although no direct impacts to architecturally or historically significant structures are anticipated, CDOT would use best management practices to prevent unintended impacts to these resources throughout demolition and construction.

4.6 Parklands and Recreational Resources

This section considers the location of existing parks and recreation areas for potential impacts. It also evaluates the compliance with Section 4(f) of the U.S. Department of Transportation Act, and Section 6(f) of the Land and Water Conservation Fund Act.

4.6.1 Existing Parklands and Recreational Resources and Impacts

There are no parks or recreational resources in the Project Area, but the Study Area includes the Chicago Cultural Center (also a historic building), and borders Millennium Park. The Chicago Cultural Center is at Washington Street and Michigan Avenue, and is shown on Figure 11. The 24-acre Millennium Park (owned by the City of Chicago and managed by the Chicago Park District) is the nearest public park/green space, and is located on the east side of Michigan Avenue between Randolph Street and Monroe Drive, approximately 600 feet east of the *Project Area.* Millennium Park is shown on the *Study Area Map* (Figure 3), and on the Map of Park Resources near the *Study Area* (Figure 12).

Further away, the Chicago Riverwalk (including Heald Square) is approximately 1,000 feet north of the *Project Area*. Chicago Park District parks in the general vicinity (i.e., 1,500-2,500 feet from the *Project Area*) include Maggie Daley Park (Part of Grant Park) at 337 East Randolph Street, Lake Shore East Park at 450 East Benton Place, and Pritzker Park at 310 South State Street.

The *Project* would not include any demolition or construction activity in these parks and green spaces. It also would not place restrictions on public access to parks or recreational resources. Furthermore, the surrounding land uses are expected to remain unchanged. Therefore, public parks and green spaces would not be affected negatively by the proposed Washington/Wabash Station. Instead, the new station would improve and continue to provide easy, safe access for residents and guests to these public spaces, and to the cultural activities they host.

4.6.2 Section 4(f) Resources

Section 4(f) refers to the original section of the U.S. Department of Transportation Act of 1966, which established requirements for consideration of park and recreational lands, wildlife and waterfowl refuges, and historic sites in transportation project development. Collectively, these types of properties are referred to as "Section 4(f) resources." The requirements for treatment of these resources are codified in federal law in 49 U.S.C. §303 and 23 U.S.C. §138, and implemented through 23 CFR Part 774.

Projects that receive funding from, or require approval of, an agency of the U.S. Department of Transportation are generally restricted in terms of being able to "use" Section 4(f) property. Properties can only be used if there is no feasible and prudent alternative to the use of land, and the action includes all possible planning to minimize harm to the property. The term "use" is generally defined for Section 4(f) purposes as the permanent incorporation of land into a transportation facility, or the temporary occupancy of land that is adverse in terms of the preservation purpose of the statute.

As discussed above in Sections 4.5 and 4.6.1, there are both historic properties and parks/public recreation areas near the *Project* and *Study Areas*, but these properties would not be negatively affected by the *Project*. As a result, there would also be no Section 4(f) impacts to these resources.

As discussed in Section 4.5.1, the Loop Elevated itself is eligible for listing on the NRHP, and is therefore a Section 4(f) resource in its own right. However, FTA has determined that use of the Loop Elevated for the *Project* is excepted from the requirements of Section 4(f) approval pursuant to the provision at 23 CFR Part 774.13(a) which states the following:

The Administration has identified various exceptions to the requirement for Section 4(f) approval. These exceptions include, but are not limited to:

> *(a) Restoration, rehabilitation, or maintenance of transportation facilities that are on or eligible for the National Register when:*
>
> > *(1) The Administration concludes, as a result of the consultation under 36 CFR 800.5, that such work will not adversely affect the historic qualities of the facility that caused it to be on or eligible for the National Register, and*
> >
> > *(2) The official(s) with jurisdiction over the Section 4(f) resource have not objected to the Administration conclusion in paragraph (a)(1) of this section.*

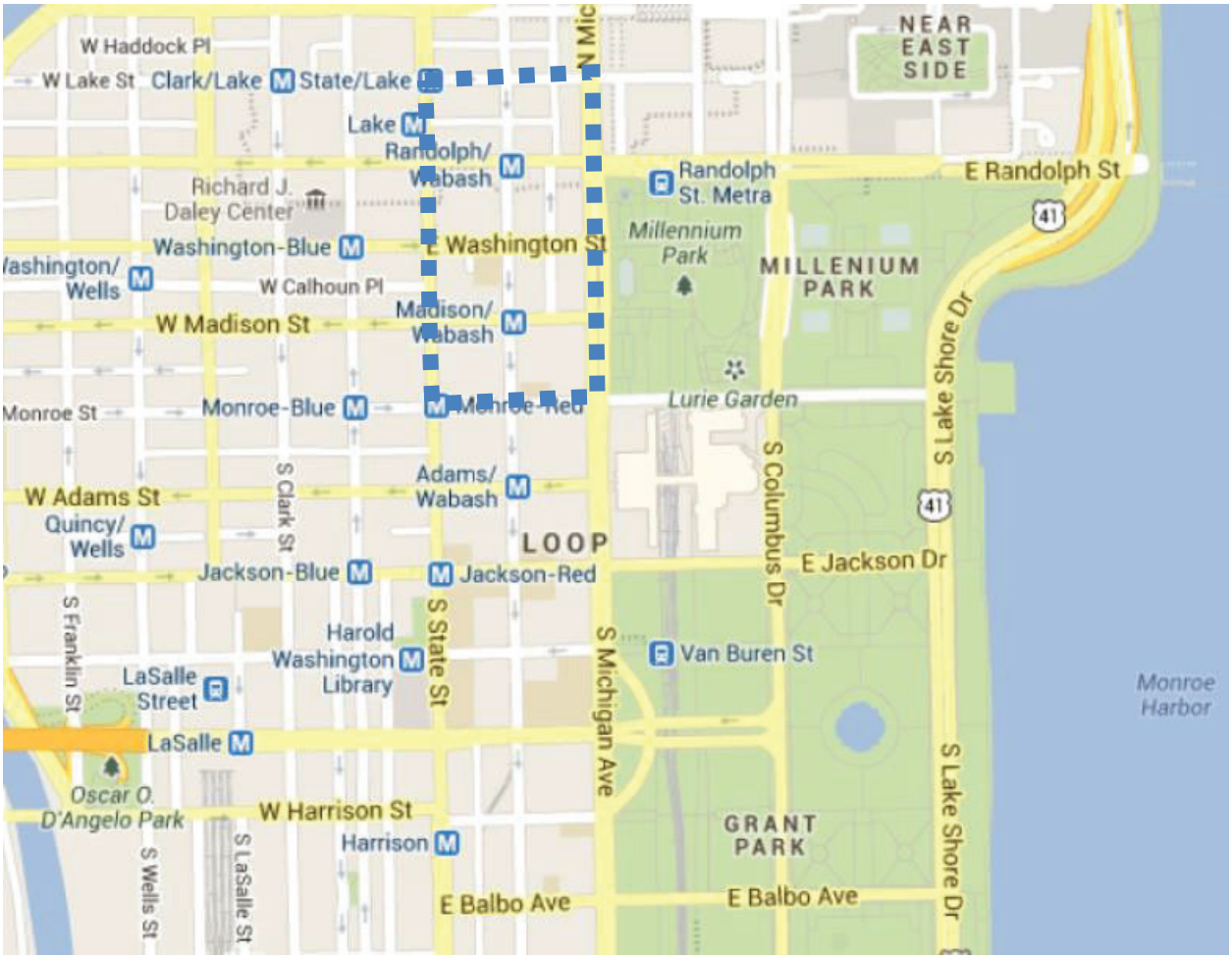
The *Project* meets the conditions of this provision. Based on this determination, and the lack of any other impacts to Section 4(f) resources, the *Project* would therefore have no Section 4(f) resource impacts. No further Section 4(f) analysis is required.

4.6.3 Section 6(f) Resources

Section 6(f) refers to a section of the Land and Water Conservation Fund Act of 1965 that was enacted to assist state and federal agencies with funding of present and future outdoor recreation sites. Once Section 6(f) funds are used, the recreation resources cannot be eliminated or acquired without coordination with the National Park Service. Research for this EA did not identify any Section 6(f) resources in the *Project* or *Study Areas*.

Figure 12 – Parks near the *Study Area*

(*Study Area* is indicated by dashed blue lines)



Source: *Chicago Park District*

Therefore, the proposed *Project* is not expected to impact any Section 6(f)-funded public properties or resources during any phase of the demolition or construction work.

4.6.4 Summary

Parks and recreational spaces would not be negatively affected by this *Project*, and mitigation measures are not necessary. No impacts to Section 4(f) or Section 6(f) resources are expected.

4.7 Visual Resources and Aesthetics

The visual resources in the *Project and Study Areas* include the views of significant architectural and historical landmarks, Michigan Avenue, Millennium Park, and a variety of urban vistas. The Louis Sullivan façades on buildings adjacent to the proposed consolidated Washington/Wabash Station are of high importance, symbolizing the architectural legacy that Chicago is acclaimed for. The conceptual open canopy design would lend itself to maintaining visual access to the aesthetically pleasing surroundings.

4.7.1 Visual Resources

Exhibit 1 of Appendix A contains preliminary design concepts and visual simulations of the *Project*. Based on a review of this preliminary design, no net negative impact on the views and visibility of historic buildings and facades along the length of the proposed platforms and station house is expected from the *Project*. There would be improved visibility of Millennium Park from several approaches, as the existing station houses that obstruct views of the park from the west would be removed and the new station would offer less obstructed views.

The illustrations and renderings in Figures 6 and 7 (Section 3.1) and in Appendix A demonstrate the aesthetic components of the transparent canopy design versus the obstructed views from the existing, solid structures.

4.7.2 Summary

Long-term negative impacts on visual and aesthetic resources are not anticipated. CDOT would take measures during construction activities to keep visual and aesthetic resources as unobstructed as is feasible.

4.8 Air Quality

The *Project* is located within a high density urban area with high traffic volumes and within an air quality "non-attainment zone" as detailed below.

While there may be temporary changes in traffic patterns during construction, once built, the *Project* would not permanently affect vehicular traffic patterns and therefore long-term air quality impacts are limited to the benefits from replacement of auto travel with increased transit use. Also, there would be temporary air quality impacts that are typical of any construction process. Heavy equipment using fossil fuels would have tailpipe emissions. Dust and dirt may be disturbed and could become airborne.

4.8.1 Non-Attainment Areas

The *Project Area*, and Cook County, are located within a US Environmental Protection Agency (EPA)-designated Non-attainment Area due to measured violations of the National Ambient Air Quality Standards (NAAQS) for ground level ozone (O_3) (Chicago-Gary-Lake County, IL-IN eight-hour Ozone Nonattainment Area) and

particulate matter ($PM_{2.5}$) (Chicago-Gary-Lake County, IL-IN $PM_{2.5}$ Nonattainment Area). As a result of the Non-attainment status, an air quality evaluation is required under the Clean Air Act to assess compliance with the Transportation Conformity Rule (40 CFR Parts 51 and 93) on a regional and project-level basis.

On a regional level, projects are assumed to conform to the provisions of the air quality State Implementation Plan (SIP) if they are included in the *Fiscal Year 2010-2015 Transportation Improvement Program* (TIP) and a conforming regional transportation plan. This *Project's* TIP ID is 01-12-0008. The TIP also confirms that this *Project* was adopted by CMAP's *GO TO 2040 Comprehensive Regional Plan for Northeastern Illinois* and by the FTA and the FHWA on October 25, 2010. (The TIP listing is included in Appendix C.) Therefore, the *Project* conforms to the existing SIP.

4.8.2 Hot Spot Analysis Requirements

The EPA's *Procedures for determining localized CO, PM_{10}, and $PM_{2.5}$ concentrations (hot - spot analysis)* [40 CFR Part 93.123] provides guidance on the types of projects for which a detailed hot spot analysis is required. In addition, Appendix A of EPA's *Transportation Conformity Guidance for Qualitative Hot-Spot Analyses in $PM_{2.5}$ and PM_{10} Nonattainment and Maintenance Areas* (March 2006) provides guidance on identifying "projects of air quality concern" for which qualitative hot spot analysis is required.

Based on this guidance, the Washington/Wabash Elevated Station *Project* does not meet any of the relevant criteria for "projects of air quality concern" or for which a detailed hot spot analysis is required. Thus, there is no need for detailed hot spot analysis. See Appendix C for Non-Attainment and Hot Spot Analysis references.

4.8.3 Summary

Long-term negative impacts to air quality are not anticipated. (The consolidated Washington/Wabash Station is actually expected to have positive effects on air quality by virtue of encouraging potential riders to use public transit rather than cars.)

To mitigate temporary air quality issues common to construction projects, CDOT would use Best Management Practices to keep equipment idling at a minimum, and otherwise minimize temporary negative impacts on air quality from dust and equipment.

4.9 Noise and Vibration

Noise and vibration evaluations were conducted using the FTA Transit Noise and Vibration Impact Assessment guidance (May 2006).

The *Project* is within an area that the Loop Elevated has traversed since 1897. As described in earlier sections, this eastern leg of the Loop Elevated serves five train lines. The existing noise environment is characterized by the dense, urban development of this core area of Chicago's Central Business District including high auto traffic volumes and frequent transit service.

A generalized noise impact assessment was conducted for the proposed Washington/Wabash Station, in accordance with procedures described in the document 'Transit Noise and Vibration Impact Assessment' (FTA-VA-90-1003-06). The analysis utilized the Noise Impact Assessment Spreadsheet of the FTA (version: 7/3/2007) to estimate generalized impacts to the noise-sensitive receptors at the Madison/Wabash intersection, based on the frequency and schedule of elevated train service and published auto volumes. The analysis accounts for construction of the new elevated station not being accompanied by any proposed changes in the frequency of elevated train service in the Loop or by any alteration of the existing alignment of the elevated tracks.

4.9.1 Noise

A noise study utilizing the FTA Transit Noise and Vibration Impact guidance (May 2006) has been conducted with calculations and spreadsheets in Appendix C and results reported below.

Inputs to the noise model included existing elevated train service (day and night volumes), published daily auto traffic volumes and average speeds on Madison Street and Wabash Avenue, and the use of high-rise residential buildings as the noise sensitive receptors near the intersection of the two streets. No field measurements are available; therefore, background noise levels were drawn from reference tables provided in the FTA manual to represent the urban character of the Loop and the relatively short distance from the elevated trains to the receptors.

The existing noise environment is the result of dense urban street traffic, the vehicle type and frequency of CTA train service, and the close proximity of noise-sensitive receptors (high-rise residential buildings) to the elevated tracks. The analytical results point to moderately high existing noise levels; however, these results are greatly influenced by the auto traffic volumes and the short distances from the buildings to the street and elevated rail tracks. Even if there were a proposal to increase rail service by 50%, there would be no change in the level of noise impact that local residents would experience. Instead, the consolidation of two stops into one has the potential to reduce somewhat the net amount of noise due to braking by trains operating in the *Study Area.*

Temporary noise impacts during construction would inevitably occur. However the noisier types of construction work would occur during regular work hours, where the existing high noise levels would mask the impact. Work during night time hours would be infrequent and generally limited to the types of work that cannot be done while trains operate, such as replacement of bents in the structure. This work should be no louder than transit operations that would be detoured to conduct this work.

4.9.2 Vibration

Among the factors that influence vibration impacts are the type and condition of the structures supporting the rail service; the types of transit vehicles and their speeds; the distance to the nearest receptors and the nature of the receptor buildings. In general, the replacement of the century-old Randolph/Wabash and Madison/Wabash Stations with a single new structure would result in lesser ground-borne vibration.

The proposed station would be constructed to modern design standards and would replace the worn structural components that have served for many years at the two stations to be demolished.

The Loop elevated trains serve the densest area of the traditional Chicago Central Business District. Wabash Avenue is lined with high-rise buildings which, because of their mass and depth of foundations, are the most resistant to ground-borne vibration of any structures.

There would be no changes in the frequency or number of elevated trains traversing the Loop as a result of the *Project*, nor would the distance from the rails to the receptors be shortened. As a result, no ground-borne vibration impacts are expected.

The construction of supports for the new station would utilize micropiles and auguring. Vibration impacts that can occur during some construction projects due to pile driving or hammering would not be present in this *Project*.

4.9.3 Summary

There would be no permanent changes to the noise and vibration environment in the *Project Area*.

- Noise volumes would be unchanged because there are no proposed long-term changes in service frequency, or speeds of the CTA rapid transit as a result of the *Project*, and no anticipated impact on the street traffic below the elevated tracks.
- There are no anticipated impacts from the vibration because there would be no substantial change to the immediate environment from the proposed station.
- New design standards employed by CDOT and the resilience of the buildings in the Chicago's Central Area would also prevent any substantial vibration impacts.

Construction-related noise and vibration mitigation measures would include:

- Although construction-related noise and vibration levels should typically be no worse than current conditions, work that has any potential to be louder than regular train operations would be scheduled during daytime hours where it can blend into overall background noise levels.
- Construction methods that have greatest potential for vibration impacts would not be present.
- CDOT and its contractors would comply with Chicago's Environmental Noise Ordinance (Article XXI). Even though "public improvements authorized by a governmental body or agency" are exempted from some provisions of the ordinance, CDOT would still attempt to follow those provisions to the extent feasible.
- Ensuring that pile driving would not occur.
- CDOT would use other Best Management Practices during construction to minimize noise and vibration.

4.10 Floodplains

The *Study Area* was evaluated for the presence of floodplains. According to Federal Emergency Management Agency (FEMA) maps, the *Study Area* is within "Zone X" as shown in a FEMA Flood Insurance Rate Map (FIRM) (see Figure 13). "Zone X" designates an area with a low flooding probability.

Because the *Study Area* is not in a Flood Zone, there are no flooding impacts anticipated and mitigation measures are not applicable.

4.11 Water Resources

The *Project* was researched for impacts to water resources in the *Study Area*.

4.11.1 Navigable Waterway

The *Project* is not within close proximity of a river or lake, or a navigable waterway under the jurisdiction of the U.S. Army Corps of Engineers (USACE); therefore permits from USACE would not be sought as there are no anticipated impacts on navigable waterways.

4.11.2 Section 401/404 of the Clean Water Act (CWA)

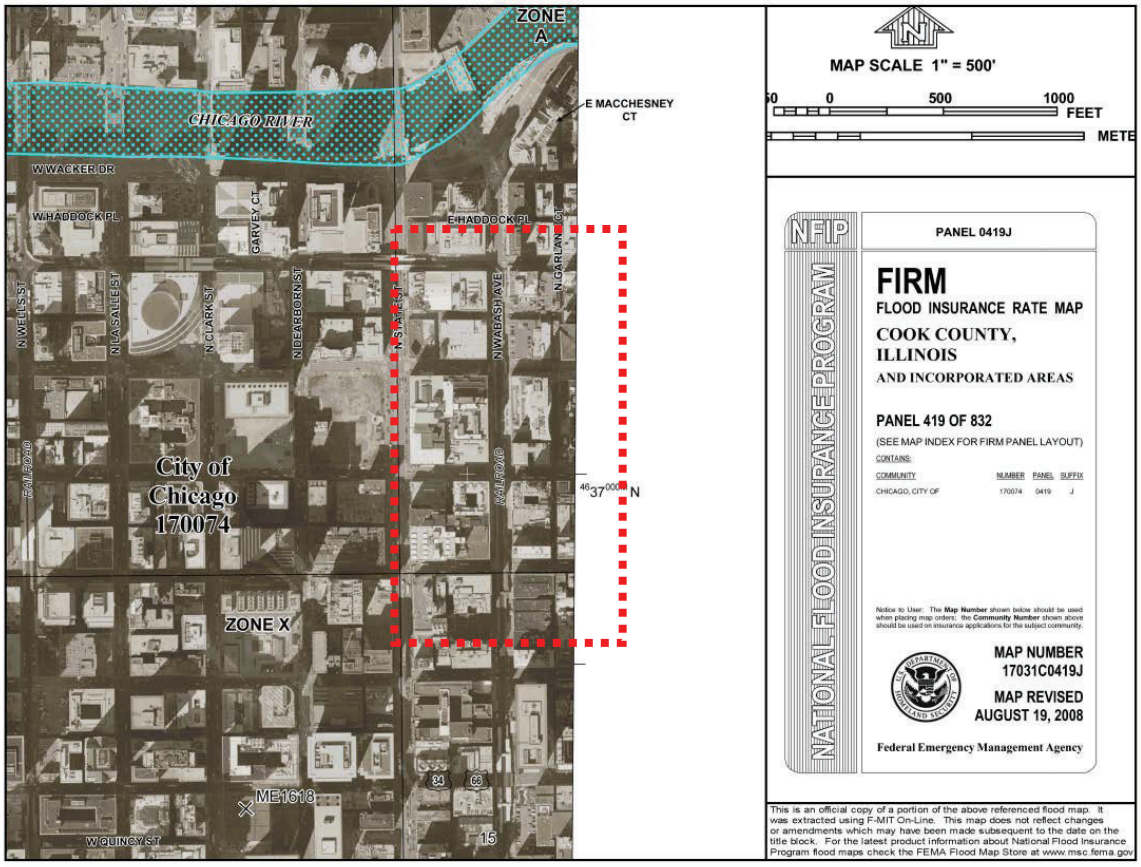
The *Project* is not within close proximity of a river or lake and therefore would not fall under the U.S. EPA's CWA regulations.

4.11.3 National Pollutant Discharge Elimination System

The *Project* would not impact water resources and therefore would not fall under NPDES regulations.

Figure 13 – Flood Insurance Rate Map (FIRM) for *Study Area*

(*Study Area* is indicated by dashed red lines)



Note: The easternmost portion of the Study Area is located on Panel 438 of 832 (Map #17031C0438J) and is also designated as "Zone X"

Source: Federal Emergency Management Agency Map Service Center (msc.fema.gov)

4.11.4 Summary

There are no impacts to navigable waterways, river or lakes, or water resources falling under the NPDES regulations. Nonetheless, as a matter of agency policy, CDOT would use Best Management Practices related to discharge of water borne pollutants from construction activities.

4.12 Wetlands

US Fish and Wildlife Service (USFWS) and Cook County maps have been consulted for the existence of wetlands in the *Study Area* up to ¼ mile from the *Project Area*. There are no wetlands in the *Study Area* as shown in a National Wetlands Inventory map, Figure 14 below.

There would be no wetland impacts as a result of this *Project* and thus mitigation measures are not applicable.

4.13 Biological Resources

The *Study Area* was evaluated for the presence of biological resources. The *Study Area* is located in a heavily developed urban area with no biological resources. As a result no impact to biological resources would be anticipated and mitigation measures are not applicable.

4.14 Ecologically Sensitive Areas

The *Study Area* was researched for ecologically sensitive resources such as endangered and threatened species. The Illinois Department of Natural Resources (IDNR) and U.S. Fish and Wildlife Service (USFWS) were consulted.

4.14.1 IDNR EcoCAT Correspondence

An IDNR EcoCAT consultation response letter was received with the conclusion that "adverse effects are unlikely." This is found in Appendix C.

4.14.2 USFWS Correspondence

A USFWS "No Effects Determination Letter" and an accompanying "Threatened and Endangered Species List" for Cook County are provided in Appendix C. Since the *Project* is in an urban central business district where no habitat for Threatened and Endangered Species exists, no impacts are anticipated.

4.14.3 Summary

Ecologically sensitive habitats are not present. Therefore impacts on threatened and endangered species are not anticipated and mitigation measures are not applicable.

Figure 14 – Wetlands Inventory Map for the *Study Area*

(*Study Area* is indicated by dashed red lines)

4.15 Hazardous Materials

In order to plan for the handling and disposal of potentially hazardous materials, database research was conducted for the *Study Area* and an on-site inspection was conducted at the current Randolph/Wabash and Madison/Wabash Stations. The inspection was performed by an individual with an Asbestos Professional License and a Lead Risk Assessor License both issued by the Environmental Health division of the Illinois Department of Public Health following standards based on USEPA guidelines. During the inspection, potential Lead Based Paint (LBP)-containing surfaces were identified and samples were collected. These were sent to a laboratory for analysis which confirmed the presence of LBP. Results of the LBP analyses are found in Appendix D. The inspector identified no suspected Asbestos Containing Building Materials (ACBMs) during the visual survey, so no ACBM sampling was conducted.

The potential for Recognized Environmental Conditions (RECs) within the *Study Area* has been researched in government records for the *Project Area* and within 1/8 of a mile from the proposed station. This research included State of Illinois and Federal Environmental Protection Agency databases, Freedom of Information Act (FOIA) requests, and other records containing historical land use and compliance history. The results are summarized below, and full results are included in Appendix D.

The potential areas of RECs concern have been documented to guide the geotechnical sampling, soil characterization during construction, and the appropriate disposal methods for contaminated materials.

The handling of any hazardous materials, such as LBP and ACBM, encountered during demolition and construction activities would follow applicable local, state, and federal rules and regulations.

4.15.1 Visual Survey for Lead Based Paint and Asbestos Containing Building Materials

The structural elements slated for demolition were sampled for the presence of LBP and analyzed by a certified laboratory. Data results were interpreted for remediation, containment, and handling during demolition and construction activities, to protect worker health and prevent contamination of the ambient environment. The survey focused on the exterior of the station houses, platforms and superstructure of the elevated rapid transit tracks. The results indicated the presence of lead above the Housing and Urban Development (HUD) definition of LBP in 10 of the 11 samples collected on elements of the two stations. See results in Appendix D.

During the onsite visual survey of the Randolph/Wabash and Madison/Wabash Stations and their transit facilities, the inspector identified that the stations were composed of metal structures and roofing that, in his professional judgment, were not suspected to contain ACBM. Therefore, sampling for ACBMs was not conducted.

4.15.2 Local, State, and Federal Hazardous Materials Database Findings

Research for RECs included State of Illinois and Federal Environmental Protection Agency databases, Freedom of Information Act (FOIA) requests, and other records containing historical land use and compliance history in and around the *Study Area*. (Full results are included in Appendix D).

These databases identified a few REC locations within the *Study Area*.

- 25 East Washington, 111 North Wabash, and 111 North State have small quantity generators (SQG), which do not pose an environmental risk to construction activities. An example of the type of SQG present is the one at 111 N. Wabash associated with a medical imaging office.

- 36 South Wabash had a Leaking Underground Storage Tanks (LUST) incident which was categorized as “other petroleum product”, and 23 South State had one that was “non-petroleum.” Cleanup on both concluded with No Further Remediation (NFR) letters issued on 11/21/2006.

- Several locations have Underground Storage Tanks (USTs), typically for heating oil, that are regulated and registered with the Office of the State Fire Marshal (OSFM) because of size.
    - 5 South Wabash (the Mallers Building) - two 8,000-gallon heating oil tanks were installed in 1960 and the OSFM notified in 1999.
    - 111 North Wabash - removed
    - 137 North Wabash – abandoned in place
    - 55 East Washington – three heating oil tanks, exempt
    - 180 North Michigan – one tank
    - 1-29 South State – five heating oil tanks abandoned in place

- 17 East Monroe had 4 USTs abandoned in place and is on the Dry Cleaner Tracking Database

This number of tanks is not surprising for an area of commercial land uses. Since there is no anticipated excavation or soil movement by the *Project* in these buildings, the identified RECs do not appear to pose a threat to human health.

4.15.3 Use of information during Construction

The areas of potential REC concern have been documented to guide geotechnical sampling. After final design, when construction details become known and exact excavation locations can be determined, final sampling would be conducted to assess soil conditions to confirm whether there are REC impacts and, if so, identify the specific mitigation measures to be conducted.

Following industry best practices and regulations, soils disturbed during construction would be sampled for any potential environmental contaminants for reuse and disposal purposes. If contaminated soils are found, they would be characterized for types and extent of contaminants and transported to appropriate landfills, following State of Illinois and Federal protocols.

4.15.4 Summary of Impacts and Mitigation Measures

All anticipated impacts relate to demolition and construction. These include:

- Lead Based Paint would be disturbed during demolition and construction, requiring proper precautions for worker and public safety.
- Engineering and construction teams would need to maintain awareness of Underground Storage Tanks locations on properties in the *Study Area*. However, no direct UST-related impacts are expected because all excavation on the *Project* would be in the public right-of-way.

Mitigation measures include:

- Contract documents will obligate the contractor to comply with all Environmental Laws. Among those obligations, Section XVIII.F.1 of CDOT's standard contract documents specifies that the selected contractor must comply with all applicable requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP).
- Workers would be protected from inhalation and contact with potentially hazardous materials.
- Lead Based Paint, contaminated soils or other hazardous materials would be contained and removed per industry standards and disposed of in regulated landfills as needed, all in accordance with State of Illinois and Federal protocols.
- During demolition, structural and building materials would be regularly sampled and analyzed for LBP, ACBM and other hazardous materials. If found, their removal and disposal would be monitored according to appropriate protocols.

- Disturbed soils would be tested, as would soils related to any unanticipated impact on UST's and SQG's. If contaminants are discovered, they would be characterized and the extent of contaminants and disposal method determined.

4.16 Energy

Energy use occurs in every construction project, from delivery of materials to operation of heavy equipment. A completed facility also uses energy in many ways, with lighting the most visible. CDOT is committed to sustainability, and although the new CDOT Sustainable Urban Infrastructure Guidelines were released after design of the *Project* was underway, the underlying principles would still influence the *Project*. Energy conservation priorities would be observed during final design and construction of the *Project*. This section describes some of the sustainability components of the conceptual design and their pending implementation.

4.16.1 Conservation through Design Elements

CDOT would apply sustainable standards to the design of the Washington/Wabash Station. The design team would incorporate into its specifications sustainable options for materials and energy-consuming fixtures. For lighting, Light Emitting Diode (LED) bulbs would be installed. In addition to implementing energy efficiency, the standards for lighting levels would consider impacts on riders with low vision via glare control and warmer rather than cooler color quality. As practical and fitting with the design, stairs would be lit with high lumen, fluorescent lamps or LEDs.

As appropriate for the design and visibility, signage would also use LEDs or high lumen, fluorescent lamps. Surveillance cameras would be integrated into the signage. The lighting and signage would make the station entrances highly visible. This type of signage uses 60% less energy than neon-lit signs, with a life expectancy of seven years without maintenance. (CDOT has experience working with LEDs, as it has already retrofitted 1,150 traffic signals to LEDs.)

In addition to lighting, other design elements would also be selected that demonstrate energy efficiency, low maintenance, and recyclability. For example CDOT would specify that construction materials such as glass and steel be composed of a high percentage of recycled content and be recyclable.

4.16.2 Conservation through Construction Best Management Practices

Sustainable best management practices would be followed during construction. For example, idling of construction vehicles would be kept to a minimum. Clean Construction and Demolition Debris (CCDD) requirements would be followed. Also, recycling of materials would be implemented throughout the demolition and construction activities.

4.16.3 Summary of Impacts and Mitigation Measures

Impacts would be limited to energy and fuel use typical of construction projects and transit station operations.

Mitigation strategies would include:

- Reduction of energy and fuel use throughout construction activities by use of Best Management Practices such as turning off rather than idling of construction vehicles.
- Standards would emphasize the use of energy efficient electrical systems, bulbs, and construction materials.

- The use of recycled materials and onsite recycling would be implemented during demolition and construction phases.

4.17 Traffic and Parking

There would be a reduction of an estimated four to six on-street parking spaces within the *Project Area*. The exact number and locations would be determined after final design. Except during demolition and construction, there would be no anticipated change in traffic patterns.

4.17.1 Construction-Related Temporary Closures

During demolition and construction, temporary street closures are anticipated and would be staged to minimize disruption of traffic. However, closures are anticipated to be limited to one block or two blocks of Wabash at a time. It is also anticipated that areas would be provided for pickup and drop off of customers for nearby businesses. Closures at cross streets (Madison, Washington, and Randolph) would be scheduled on separate nights and weekends to minimize disruption to businesses and educational institutions in the area.

CDOT would coordinate with the City of Chicago Office of Emergency Management and Communications (OEMC) to formulate a plan that minimizes street closures and traffic delays. The City of Chicago website has an alert notification system at www.alertchicago.org where residents can also register for Notify Chicago and create an account for receiving traffic delay alerts on cell phones. Rail and bus disruptions are updated on the CTA's website, www.transitchicago.com. Information on *Project* construction related traffic delays would be posted on these websites as appropriate. CDOT would also work with the Alderman of the 42nd Ward, to post on the 42nd Ward website, http://www.ward42chicago.com, updates on the *Project's* progress and any street closures or construction-related schedule changes on the five CTA Lines serving the Wabash Elevated stations. See Sections 5.2 (Public Coordination) and 5.3 (Traveler Notification) for further details.

4.17.2 Summary of Impacts and Mitigation Measures

Pedestrian access would be maintained to all businesses. Temporary traffic closures are expected on the Washington-Madison block of Wabash Avenue during most of construction, with occasional scheduled night/weekend closures at other locations during station demolition. These would be mitigated through public information and standard Maintenance of Traffic plans. One to three blocks of parking would be closed at various stages of construction, and some loading zone operations may shift to Garland Court for buildings east of Wabash, and to an existing alley for buildings west of Wabash.

Four to six on-street parking spaces would be removed permanently due to curb extensions for elevators, and stair/escalator landings. These parking losses are minor in the scope of downtown Chicago and would be mitigated by the inventory of well-marked private parking garages in the *Study Area*. CDOT would work with the Alderman's office to determine the most appropriate allocation of the remaining curb space in terms of parking and loading areas.

There are no anticipated long term effects on traffic patterns.

4.18 Safety and Security

CDOT would implement safety and security measures throughout the duration of this *Project*, from demolition through construction, and after completion. Planned measures for the completed station include visible signage and well-lit stairs and platforms. During demolition and construction, CDOT safety and security best practices would be followed. More details are found below in Section 4.19 (Construction-Related Impacts).

4.18.1 Design Elements

The station would have customer assistance buttons and phones at the station mezzanine and on each platform. Activating this call button phone would generate an audio message to a digital system as well as a text message alerting CTA staff that a rider needs assistance. The audio system would serve visually impaired customers. An elevator status visual and audio sign would be installed near or above the turnstiles. There would also be single and multi-line, dynamic scrolling marquee LED signs accompanied by public address audio announcements.

4.18.2 Summary of Impacts and Mitigation Measures

The safety and security features incorporated into the design of the Washington/Wabash Station would have a positive impact for riders using the east leg of the Loop Elevated. There are no expected long term negative safety and security impacts.

Work zones would be secured as is standard to protect the general public from construction-related safety issues. CDOT would be in close communication with the 42nd Ward Alderman's office and organizations such as the Building Owners and Managers Association (BOMA) regarding traffic impacts during demolition and construction. This process would also be used to receive feedback on safety and security issues, both real and perceived, and communicate solutions.

4.19 Construction-Related Impacts

Demolition and construction associated with the *Project* may briefly inconvenience residents, businesses and business customers adjacent to the *Project Area*. However, the *Project* would not require the closing of any local businesses, or cultural or public resources. Construction impact controls would be integrated into the *Project's* contract specifications to avoid or minimize these potential areas of impact. Construction-related activities and impacts are described below, and summarized by resource in Table 4.

4.19.1 Staging

Though traffic and transit service interruptions may occur during construction, all reasonable efforts would be taken to minimize these and communicate access changes.

At least one Loop Elevated Station in the *Project Area* would be available throughout the duration of the construction activities. The Randolph/Wabash Station would remain open until construction of the new Washington/Wabash Station is substantially complete and open for service.

On rare occasions, work may require trains to not to operate on the Wabash Avenue segment of the Loop Elevated. Such work would be scheduled for hours when no or few trains are operating. The rapid transit detour plan would match weekends 9, 10, and 12 of the Loop Track Renewal project in 2012, i.e., all Loop Elevated lines would operate on the Wells and Van Buren legs only, with Brown and Orange Lines through-routed and the Pink Line extended to Roosevelt Station.

During demolition and construction, temporary street closures are anticipated and would be staged to minimize disruption of traffic. As stated in Section 4.17.1, closures at cross streets (Madison, Washington, and Randolph) would be scheduled on separate nights and weekends to minimize disruption to businesses and educational institutions in the area. More frequent, but still temporary, traffic interruptions are anticipated along Wabash Avenue.

During demolition and construction, CDOT would communicate with the retail, institutional, and residential populations in the immediate *Project Area* and wider *Study Area* through the 42nd Ward Alderman's office. The planned demolition and construction schedule would be shared with retailers on the ground floors of buildings in the *Project Area* and in the buildings adjoining the *Project Area*.

Notifications and fliers would be posted throughout the Loop Elevated system in train stations and on the trains. There would also be direct communication with the businesses, educational institutions, and private and public service providers via electronic, popular print and online media. Sections 5.2 (Public Coordination) and 5.3 (Traveler Notification) contain details of public notification strategies.

4.19.2 Work Crew Activities

Construction work impacts would be short-term in nature and could include noise, vibration, visual quality, and air quality effects from dust. Such impacts would be mitigated according to City of Chicago construction requirements.

Construction activities would be managed by CDOT, in accordance with Federal and State of Illinois guidelines. Standards and codes contained within the City of Chicago building ordinances regarding construction coordination, compliance and permits would be followed.

Preventative actions would be based on Best Management Practices for general construction and have been described above and summarized in Table 4. To the extent possible, noisy construction activities would be scheduled to occur during normal daytime working hours when such work can more readily blend into background noise. Dust would be kept at a minimum with watering as needed. Extended idling of construction vehicles would be discouraged. Demolition debris would be recycled, if feasible, or taken to appropriate disposal facilities. Additional preventive actions would be added to the construction plan as the construction documents are finalized.

4.19.3 Summary of Impacts and Mitigation Measures

Construction impacts would be short-term in nature. These would include street closures, construction equipment traffic and parking, and dust and elevated noise levels during construction and demolition.

The following mitigation measures would be used:

- All reasonable efforts would be made to use staging to minimize the impact on traffic flow, parking, and transit operations during construction.
- Best Management Practices would be used throughout the construction period. These would include containment and appropriate disposal of hazardous materials as needed, as well as efforts to reduce environmental impacts.
- Posted signage, notifications, fliers, and website updates would be regular and targeted at all CTA riders to communicate construction information. CDOT would also be in regular and direct communication with the Alderman's office and business and building owners adjacent to the *Project Area*.

Table 4 – Construction Impacts and Related Mitigation Measures - by Resource

Resources	Impact Mitigation for Construction
All	Demolition and construction would be staged, with clear signage and outreach to businesses. The planned demolition and construction schedule would be shared with the general public, with emphasis on transit customers and retailers and other tenants of buildings adjoining the *Project Area*. To cause the least disruption, construction affecting transit service or local streets would take place during off-peak hours as much as possible. Construction and demolition activities would be coordinated with the CTA, Alderman's Office, and other City of Chicago Departments. CDOT would employ best management practices at all times.
Land Acquisition, Land Use, and Zoning	Not Applicable: No acquisition or zoning changes are needed and no land use changes are expected.
Social and Economic	The mitigation actions listed below for Traffic and Parking would also apply here.
Environmental Justice	Mitigation measures for Environmental Justice are not required. However, CDOT still plans to incorporate specific outreach efforts to community groups and service organizations that engage minority and low-income populations during the overall effort to keep all riders informed about the *Project*.
Historical and Archeological Resources	While no construction-related impacts are anticipated, CDOT would take precautions during demolition and construction to assure that there are no unintended negative impacts on nearby historic buildings.
Parklands and Recreational Resources	Cultural and natural resources would remain accessible throughout the duration of the *Project* as Randolph/Wabash Station would remain open until construction on the new Station is substantially complete and open for service.
Visual - Aesthetics	CDOT would take measures throughout construction activities to keep visual and aesthetic resources as unobstructed as is feasible.
Air Quality	To mitigate temporary air quality issues common to construction projects, CDOT would use Best Management Practices to keep equipment idling at a minimum, and otherwise minimize temporary negative impacts on air quality from dust and equipment.
Noise and Vibration	CDOT and its contractors would comply with Chicago's Environmental Noise Ordinance (Article XXI). Even though "public improvements authorized by a governmental body or agency" are exempted from some provisions of the ordinance, CDOT would still attempt to follow those provisions to the extent feasible. Also, work that would be louder than regular train operations would be scheduled during daytime hours where it can blend into background noise levels and pile driving would not occur, eliminating a common source of vibration impacts in construction. CDOT would also use other Best Management Practices to minimize noise and vibration.

Resources	Impact Mitigation for Construction
Floodplains	Not applicable: The *Study Area* is not in a flood zone
Water Resources	Not applicable.
Wetlands	Not applicable: The *Study Area* is not in a wetland.
Biological Resources	Not applicable.
Ecologically Sensitive Areas	Not applicable.
Hazardous Materials	Potentially hazardous materials on the existing structures and disturbed soils would be sampled. If hazardous waste were to be discovered, it would be removed and disposed in accordance with all municipal, state, and federal regulations. Workers would be protected from inhalation and contact with potentially hazardous materials.
Energy	Energy and fuel use would be reduced through Best Management Practices such as turning off rather than idling of construction vehicles. Design standards would emphasize the use of energy efficient and/or recycled construction materials. Onsite recycling would be utilized.
Traffic & Parking	Temporary traffic closures and detours would be mitigated through public information and standard Maintenance of Traffic plans. Pedestrian access would be maintained to all businesses. Some loading zone operations may shift to Garland Court for buildings east of Wabash, and to an existing alley for buildings west of Wabash.
Safety and Security	Work zones would be secured as is standard practice to protect the general public from construction-related safety issues. Communications channels with adjacent buildings regarding traffic impacts during demolition and construction would also be used to receive feedback on safety and security issues, both real and perceived, and communicate solutions.
Indirect Impacts	Maintenance and customer assistance resources would be targeted to Adams/Wabash (in addition to Randolph/Wabash) and State/Lake (in addition to Washington/Wabash) when adjacent stations close for demolition. Passengers on the five affected lines would be notified in advance when detours or slow zones could affect their travel or waiting times. Monitoring of service consistency would be used to determine when measures are required to alleviate or prevent “bunching” of trains.

4.20 Indirect (Secondary) Impacts

Under NEPA, indirect or secondary impacts are defined as those that are reasonably foreseeable but may occur at a different time and/or place.

For this project, indirect impacts could be caused by changes in individuals' travel patterns and by changes in transit operations.

4.20.1 Construction-Related

At the beginning of construction, the Madison/Wabash Station would close for demolition. The Randolph/Wabash Station would stay open as the primary alternate to serve these riders, but transit customers – especially those approaching from south of Madison – can also use Adams/Wabash as an interim access point to transit services on the Loop Elevated. Therefore, one construction-related indirect impact would be increased use of the Adams/Wabash station.

Another construction-related indirect impact relates to the implementation of slow zones on the Loop Elevated to protect workers on the track and detours of train service on selected weekends. These have the capacity to impact service consistency and travel times elsewhere in the City on the lines that use the Loop Elevated.

4.20.2 Post-Completion

Upon completion of construction of the Washington/Wabash Station, the Randolph/Wabash station would close for demolition. CTA customers who had approached Randolph/Wabash from the north may use State/Lake as their access point to the Loop Elevated instead of the new station. A number of customers who switched to Adams/Wabash may continue to do so, even after the new station opens.

The presence of a state-of-the-art, ADA-compliant, safe, and well-lit new station in downtown Chicago would be expected to generate new transit trips. One of the stated benefits of the Preferred Alternative (See Section 3.1.2) is the ability to draw a projected 475 trips per day from automobiles to transit. However, it could also inspire new trips by making travel to nearby attractions more convenient and attractive. This could result in indirect effects in two ways. First, the transit users (and untaken auto trips) have origins at other locations in the region, so other stations may see increases in ridership. Attractions and businesses in and around the *Study Area* may see increases in numbers of visitors. While these effects would generally be diffuse, if they do rise substantially at any one location (e.g. trips between River East hotels to convention events at the Merchandise Mart or McCormick Place (where a new Green Line Station is under construction), the impact would likely be either positive or neutral.

4.20.3 Summary of Impacts and Mitigation Measures

Expected impacts and their mitigation strategies are as follows:

- Loop Elevated boardings would be redistributed when each existing station closes for demolition, with some shifting to the next stations on the line outside the *Study Area*: Adams/Wabash Station (for Madison/Wabash) and State/Lake Station (for Randolph/Wabash). This can be mitigated by targeting maintenance and customer assistance resources to the recipient stations in the days surrounding the closures.

- Construction-related slow zones and detours have the potential to affect service consistency elsewhere on the lines that use the Loop Elevated. This can be mitigated with advisory "expect delays" notices to passengers at outlying stations, and targeted monitoring of schedule adherence on these lines – with individual train runs being directed to run express when necessary to avoid "bunching".

- Transit trips generated by the new station would start or end at locations outside the *Study Area*. Some may draw new users to business and attractions in and around the *Study Area*. These impacts would not require mitigation because they would likely either be positive, neutral, or too diffuse to be significant.

4.21 Cumulative Impacts

The *Project* was studied for cumulative impacts. These are defined as: "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." (40 CFR Part 1508.7)

4.21.1 Cumulative Impacts – Findings

The Washington/Wabash Station is one of several current and planned transportation modernization efforts in Chicago's Downtown area. These plans for modernization are designed to enhance the public transit experience. They aim to increase ridership and to provide efficient, secure, access to Downtown Chicago's resources.

Of these projects, the one with the greatest ability to have cumulative impacts with the *Project* is the Central Loop (a.k.a. "East-West") Bus Rapid Transit (BRT) project. The BRT project would add bus lanes adjacent to the Washington/Wabash Station on Madison and Washington streets, and enhanced, level-boarding stations on Madison just east of Wabash Avenue, and Washington just west of Wabash Avenue.

In the long term, this is expected to generate a positive impact. This transfer point would provide more attractive CTA bus connections on six routes that together connect the Washington/Wabash Station, Metra commuter rail terminals, the major tourist attraction of Navy Pier, and the Central and East Loop areas.

Since both projects are projected to be under construction in 2014, this could provide opportunities for coordination to minimize net construction disruption for motorists and transit users. A recent example of such coordination (in 2013) was when a 9-day closure of the Brown Line service over the Wells Street Bridge for construction was accompanied by a concurrent weekend closure of the nearby CTA control tower for repairs.

4.22.2 Summary of Impacts and Mitigation Measures

Long-term, cumulative impacts are anticipated to be positive, including increased transit access and ridership, and potential development in the vicinity. During construction, the Central Loop BRT project would also have construction impacts, but schedule coordination may be able to allow one project to "piggyback" on a traffic disruption required by the other project, mitigating the combined impact on traffic.

5 PUBLIC INVOLVEMENT AND PROJECT COORDINATION

This section of the EA details the ongoing and planned public involvement efforts by the Chicago Department of Transportation (CDOT) (the sponsoring agency), the Chicago Transit Authority (CTA) (the operating agency), and the Federal Transit Administration (FTA), (the lead federal agency). To date, CDOT has been in regular contact with the office of the Alderman for the 42nd Ward of the City of Chicago, in which the entire *Project Area* is located. CDOT has presented and would continue to present this *Project*'s concept to public agency officials, community organizations, and professional groups.

5.1 Agency Coordination

Coordination with agencies such as the Illinois Historic Preservation Agency (IHPA), CTA, Chicago Metropolitan Planning Council (CMAP) and environmental compliance agencies has commenced and would continue throughout the life of the *Project*. See Appendix E for the Public Involvement Matrix, which itemizes these outreach efforts.

5.2 Public Coordination

Meetings with community leaders and organizations have taken place with the assistance of the 42nd Ward Alderman's office. The Alderman has coordinated meetings for CDOT to share *Project* information with his constituents and to bring awareness of the *Project* to the public.

During demolition and construction, CDOT would continue to communicate with the retail, institutional, and residential populations in the immediate *Project Area* and wider *Study Area* through the 42nd Ward Alderman's office. The planned demolition and construction schedule would be shared directly with retailers on the ground floors of buildings in the *Project Area* and in the buildings adjoining the *Project Area*.

There would also be direct communication with the businesses, educational institutions, and private and public service providers via electronic, popular print and online media.

See Appendix E, Public Involvement Matrix, for details on Public Coordination to date and ongoing efforts planned.

5.3 Traveler Notification

CDOT's recent reconstruction of the Wells Street Bridge gives a good example of the type of outreach efforts CDOT and CTA make to transit users when a capital project disrupts service. For the bridge reconstruction, both agencies have provided on their websites, updates, video clips of the project's progress, alternative routes, shuttle buses, schedules, and contact information for riders with questions. For both the bridge reconstruction project and this *Project*, the public would be directed to the following websites: http://www.chicagodot.org and http://www.transitchicago.com/

However, this *Project* is expected to have a lesser impact than the Wells Street Bridge Project, because at most times, riders would be able to board trains within two blocks of their previous location (Randolph/Wabash Station or Adams/Wabash Station). During rare and brief closure of the track segment, train operations would be rerouted using previously executed plans from the CTA's 2012 Loop Track Renewal project - for which public information materials have already been prepared.

Riders using the Randolph/Wabash and Madison/Wabash Stations would be made aware of the construction impacts, and the schedule of the *Project* and its progress, with fliers, with signage throughout the CTA system, and through the CDOT and CTA websites. At www.alertchicago.org, individuals can also sign up for cell phone notifications by registering for Notify Chicago traffic alerts.

Notifications regarding the progress of the *Project* would take place through other media as well. The *Project* team would also send notices to neighborhood organizations located along the five CTA train lines serving this station. These organizations would include community groups in the neighborhoods of Woodlawn, Englewood, and Pilsen/Little Village, Lakeview, etc. The Little Village Environmental Justice Organization (LVEJO) is an example of a transportation-oriented community group which could further disseminate the information to community residents.

As noted earlier, the demolition of the Madison/Wabash Station would occur first. The construction of the new station at Washington/Wabash would follow. Throughout the duration of the *Project*, riders would be advised that the Randolph/Wabash Station would remain open until the Washington/Wabash Station is substantially complete and open for service.

5.4 Public Hearing

A public hearing will take place in Downtown Chicago on March 20, 2014, at the Chicago Cultural Center which is located in the Study Area. CDOT and CTA will advise the public of the availability of the Draft EA and seek the public's comments. The public will be invited to the public hearing via print and electronic media, as well as through signage in centrally-located areas, such as the current CTA Madison/Wabash and Randolph/Wabash Stations, and heavily-frequented retailers, restaurants, and institutions.

Documentation of the public hearing will be made available for further comment and feedback. A public comment addendum, which will contain comments received on the *Project* and responses to these comments, will be published after the end of the 30-day comment period.

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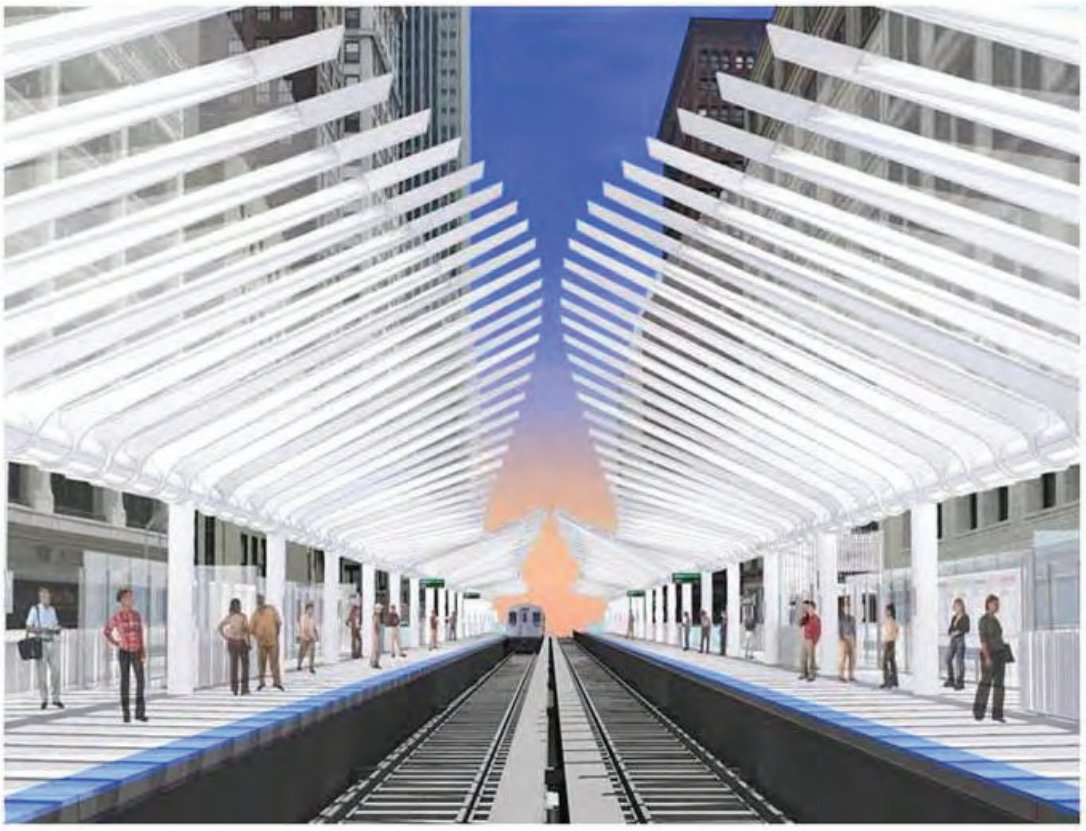
CHICAGO DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

Washington/Wabash Loop Elevated Station

ENVIRONMENTAL ASSESSMENT (EA) – APPENDICES

February 2014



Prepared by the Chicago Department of Transportation

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CHICAGO DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

Washington/Wabash Loop Elevated Station

ENVIRONMENTAL ASSESSMENT (EA) – APPENDICES

February 2014

Prepared** by the **Chicago Department of Transportation

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Appendix A

Preliminary and Concept Designs for Two Alternatives:

- Preferred Alternative
- Non-Preferred Alternative

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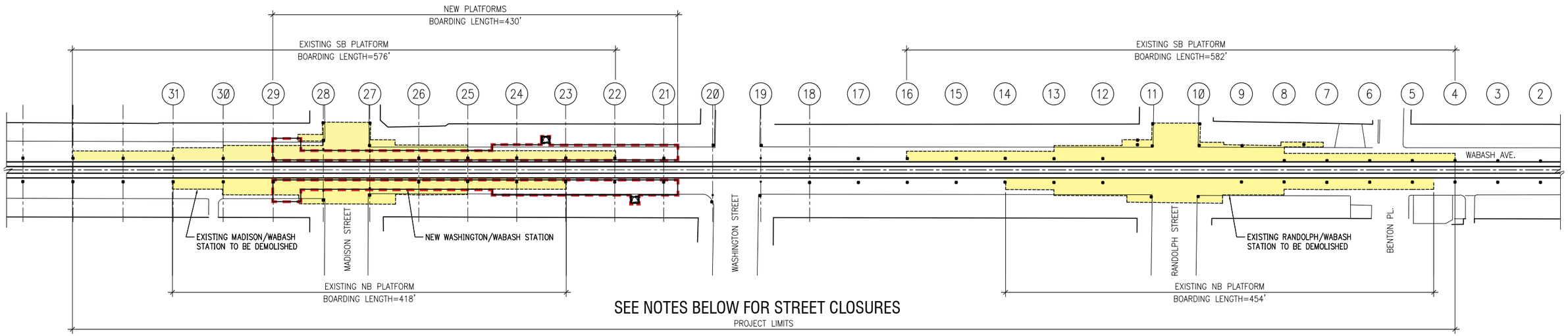
Preferred Alternative

Washington/Wabash Loop Elevated Station – Appendix A – Exhibit 1 – Preliminary Design Concept for Preferred Alternative



1 LIMITS OF EXISTING STATIONS

NORTH

PHASING :

1. DEMOLISH EXISTING MADISON/WABASH STATION. (TEMPORARY CLOSURE OF WABASH AVE SOUTH OF MADISON STREET).

2. INSTALL TEMPORARY PIERS AND REPLACE BENTS 21, 22, 23, AND 24. CONSTRUCT NEW COLUMN FOUNDATIONS. (TEMPORARY CLOSURE OF WABASH AVE BETWEEN RANDOLPH AND WASHINGTON STREET).

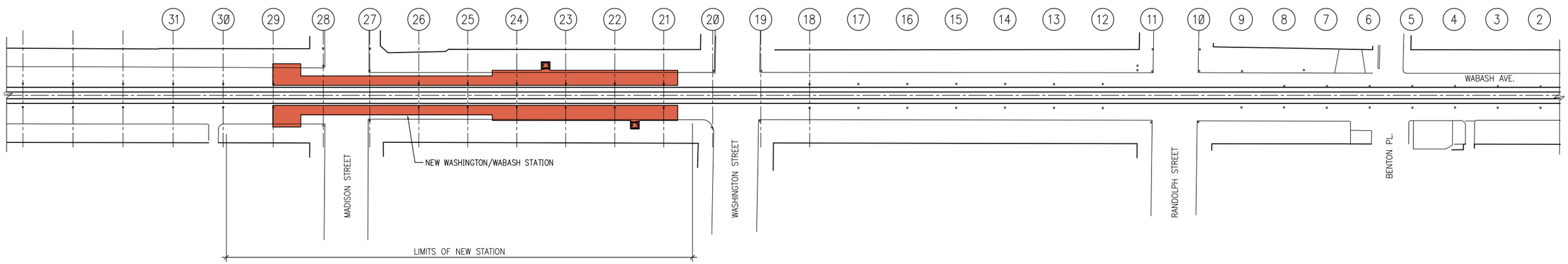
3. CONSTRUCT NEW STATION. (TEMPORARY CLOSURE OF WABASH AVE BETWEEN RANDOLPH AND WASHINGTON STREET).

4. OPEN NEW WASHINGTON/WABASH STATION.

5. DEMOLISH EXISTING RANDOLPH/WABASH STATION. (TEMPORARY CLOSURE BETWEEN WASHINGTON AND BENTON PLACE).

6. SIDEWALKS WILL REMAIN OPEN DURING CONSTRUCTION.

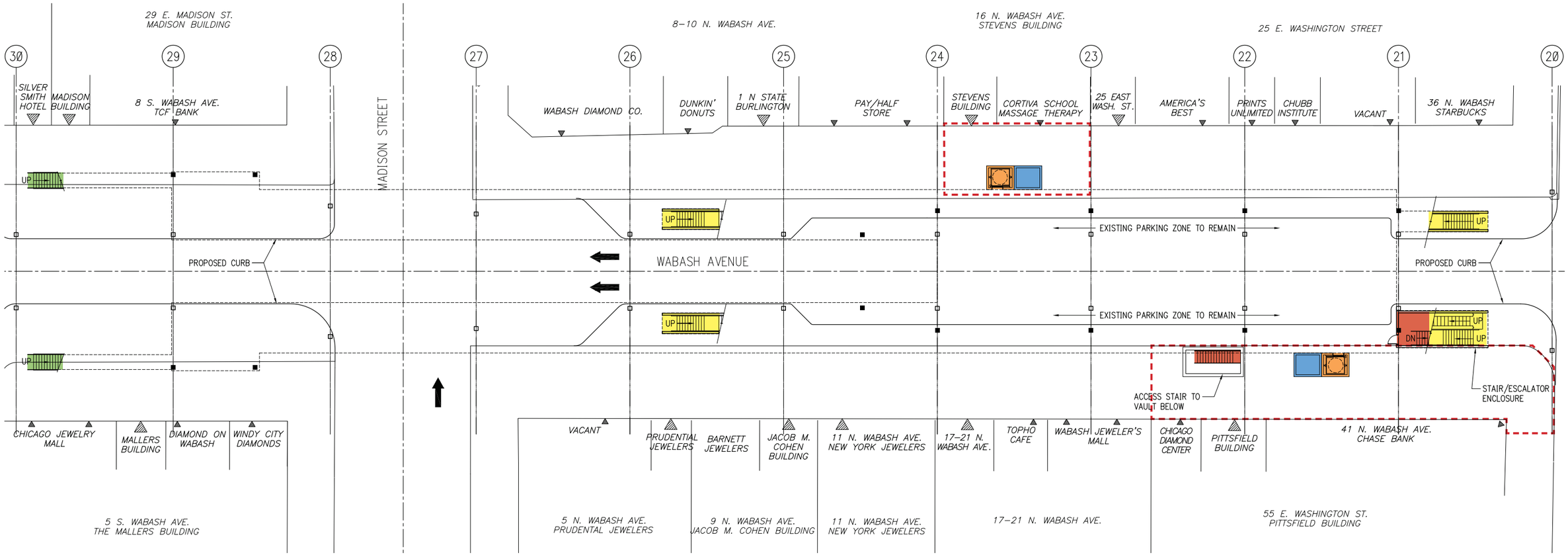
7. ACCESS TO ALL BUILDINGS AND BUSINESSES WILL BE MAINTAINED THROUGHOUT THE PROJECT.



2 NEW PROPOSED STATION

NORTH

WASHINGTON / WABASH LOOP ELEVATED STATION | Preliminary Design Concept | September 3, 2013



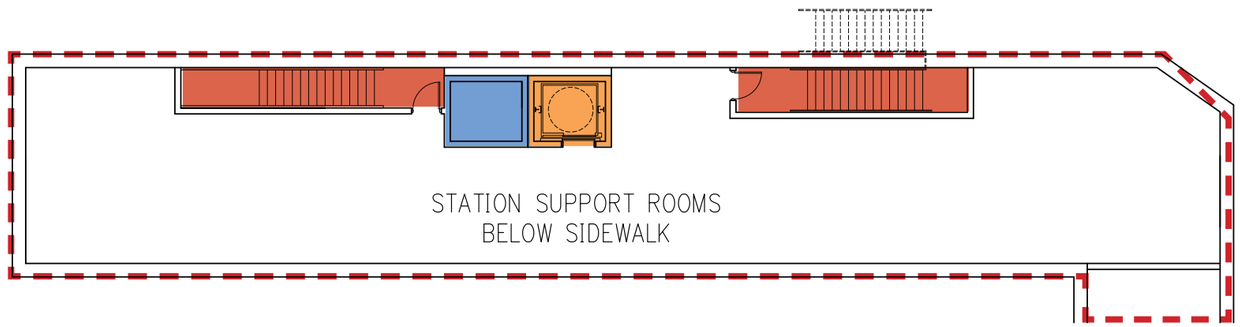
1 STREET LEVEL PLAN

SCALE: 1/16" = 1'–0"

NORTH

0 4' 8' 16' 32' 48'

- **STAIRS**: TO SIDEWALK VAULT
- **STAIRS**: TO MEZZANINE
- **STAIRS**: TO PLATFORM
- **ELEVATOR**: TO MEZZANINE
- **ELEVATOR**: TO PLATFORM
- **NEW COLUMN LOCATION**



0 VAULT LEVEL PLAN

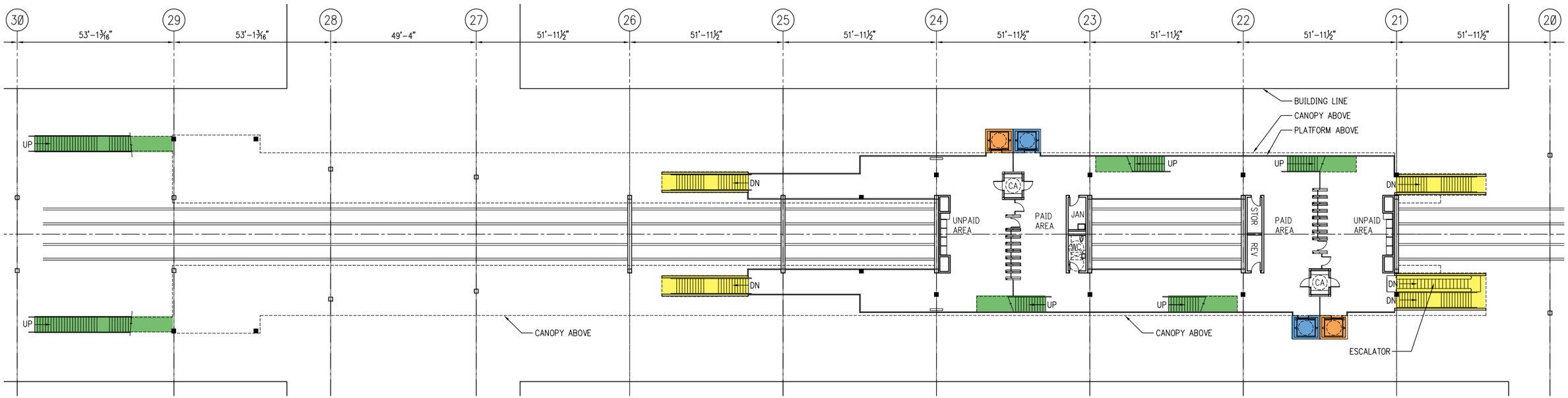
SCALE: 1/16" = 1'–0"

NORTH

0 4' 8' 16' 32' 48'

WASHINGTON / WABASH LOOP ELEVATED STATION | Preliminary Design Concept | September 3, 2013

WASHINGTON/WABASH LOOP ELEVATED STATION | Preliminary Design Concept | September 3, 2013



MEZZANINE LEVEL PLAN

0 4' 8' 16' 32' 48'

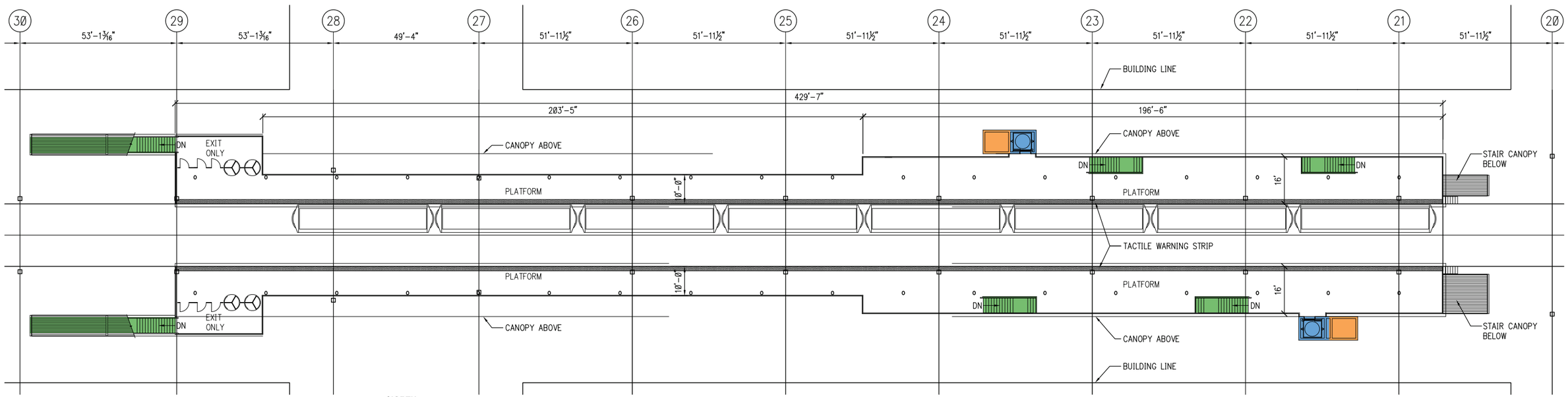
NORTH

STAIRS: TO MEZZANINE

STAIRS: TO PLATFORM

ELEVATOR: TO MEZZANINE

ELEVATOR: TO PLATFORM



3 IMPROVED PLATFORM LEVEL PLAN

NORTH

STAIRS: TO PLATFORM

ELEVATOR: TO MEZZANINE

ELEVATOR: TO PLATFORM

WASHINGTON / WABASH LOOP ELEVATED STATION | Preliminary Design Concept | September 3, 2013

Rendering Looking North

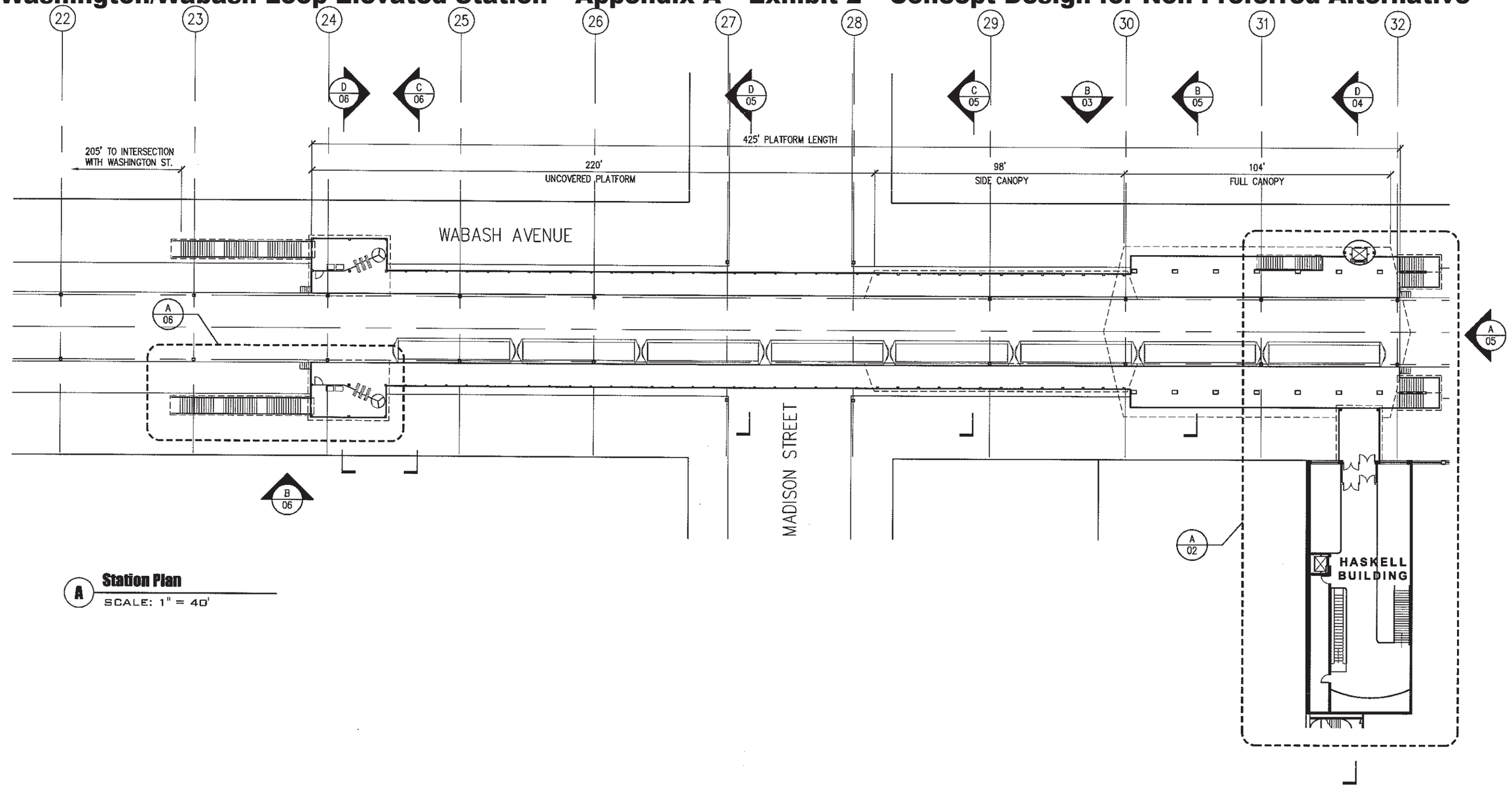
Aerial View Looking South

55 E. Washington | 17 N. Wabash | 11-15 N. Wabash | 7-9 N. Wabash | 1-5 N. Wabash | 5 S. Wabash

14 S. Wabash | 29 E. Madison | 2-14 N. Wabash | 16 N. Wabash | 25 E. Washington

Non-Preferred Alternative

Washington/Wabash Loop Elevated Station – Appendix A – Exhibit 2 – Concept Design for Non Preferred Alternative



A Station Plan
SCALE: 1" = 40'

Washington/Wabash Loop Elevated Station
Environmental Assessment - Appendices

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CDOT Chicago Department of Transportation

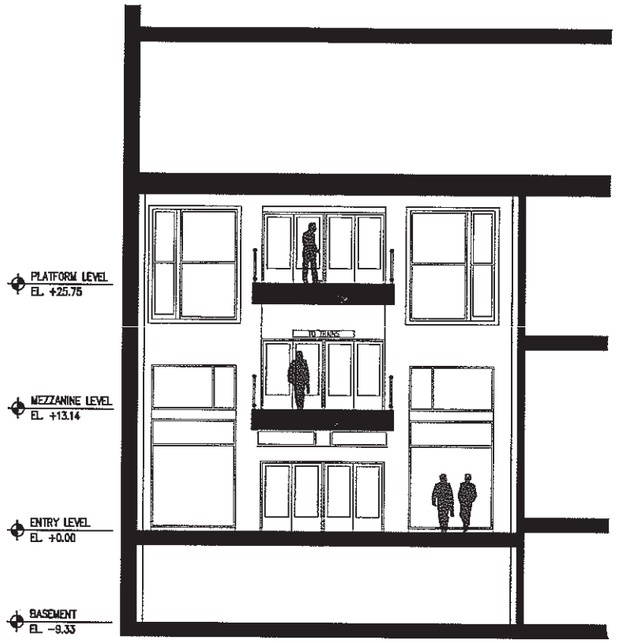
Earth Tech — A tyco International Ltd. Company

WASHINGTON WABASH STATION
CDOT Project No. D-3-102
Phase I - 30% Conceptual Design, In Progress

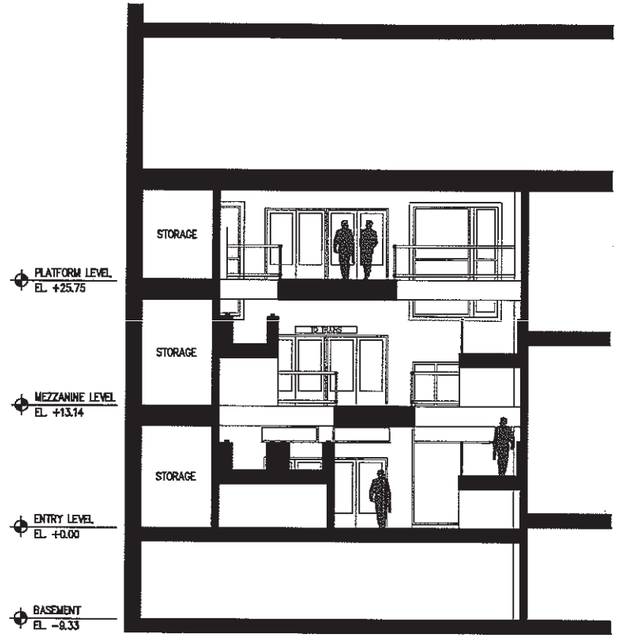
Overall Station Plan
Sheet 00
4/6/06 Rev. 10
Scale: 1" = 40'

DLK Civic Design

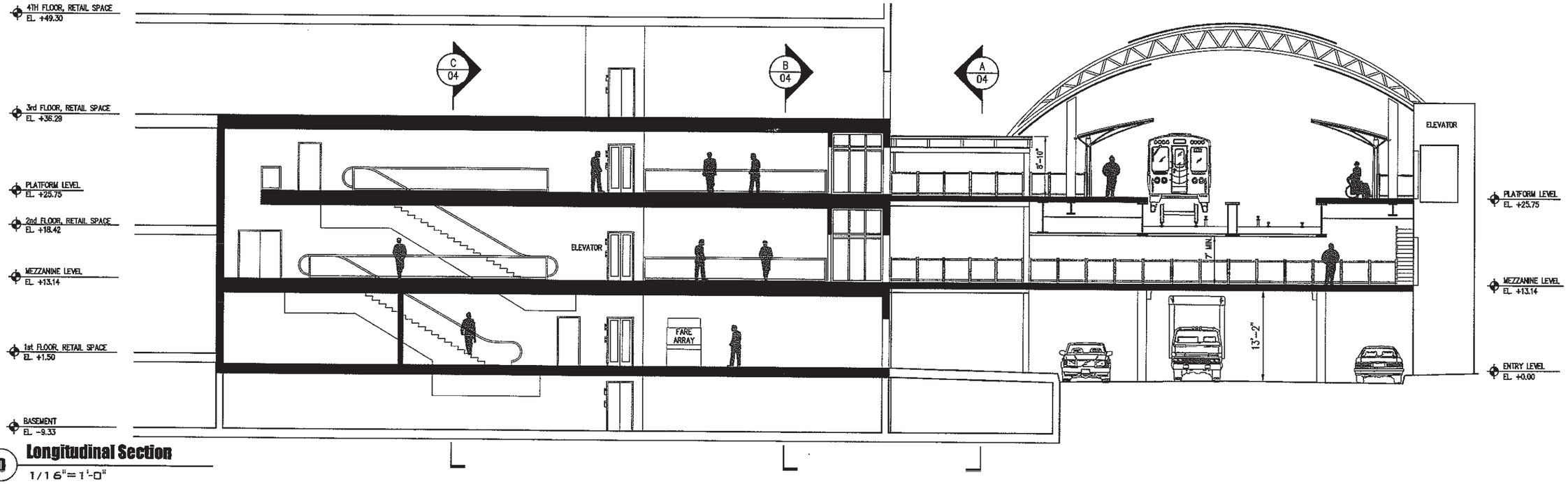
A Section through Bridge
1/16"=1'-0"



B Transverse Section
1/16"=1'-0"



C Transverse Section
1/16"=1'-0"



D Longitudinal Section
1/16"=1'-0"

CDOT CHICAGO DEPARTMENT OF TRANSPORTATION

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WASHINGTON WABASH STATION

CDOT Project No. D-3-102

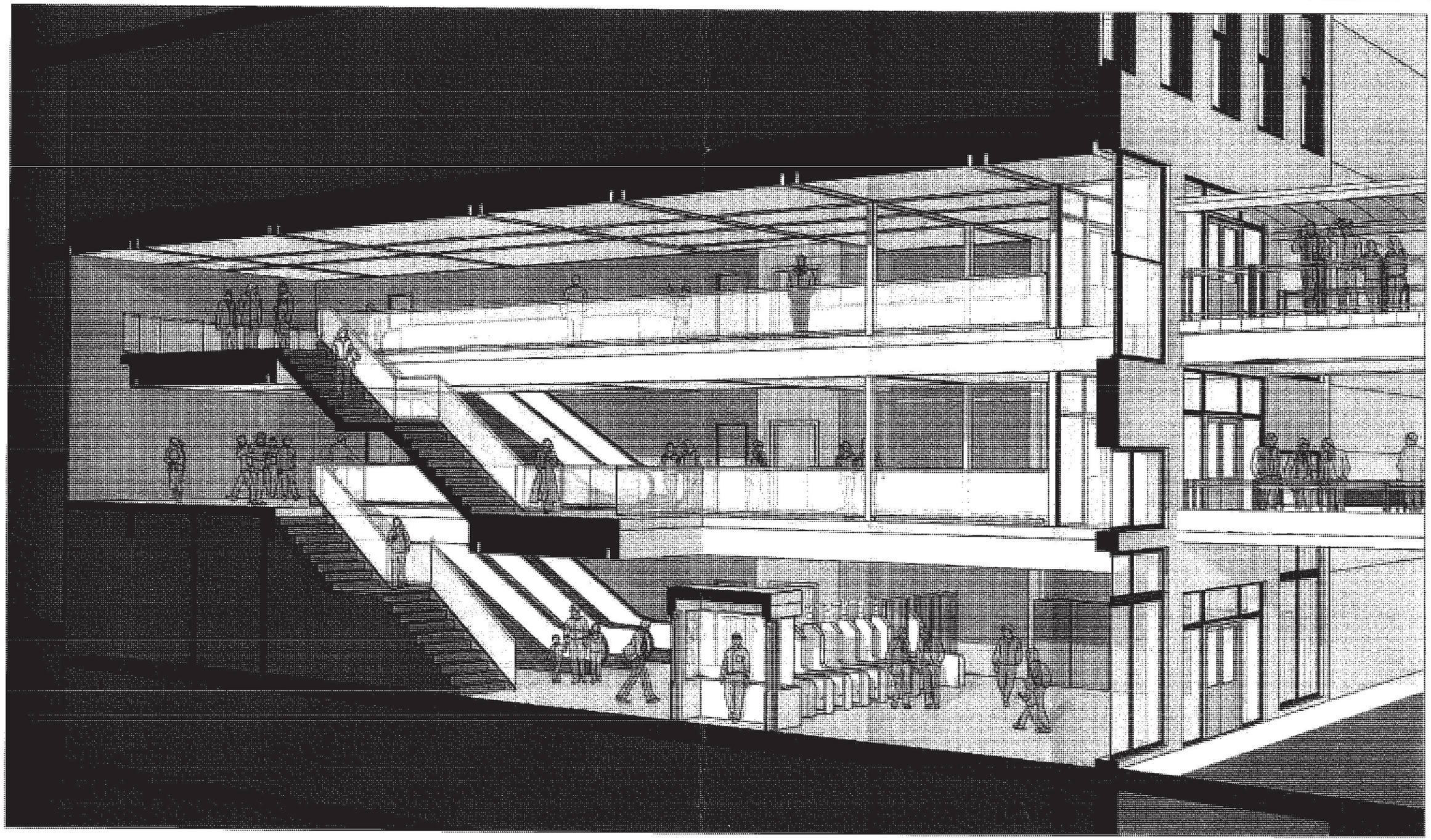
Phase I - 30% Conceptual Design, In Progress

4/6/06 Rev. 10

Sections
Sheet 04

Scale: 1/16" = 1'-0"

DLK Civic Design



CDOT

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WASHINGTON WABASH STATION

Phase 1 - 30% Conceptual Design - In Progress

CDOT Project No. D-3-102

Section Perspective

Sheet 05

4/11/06

DLK Civic Design

© DLK Architecture 2006

IMAGE DEPICTING POSITION OF PROPOSED BRIDGE CONNECTING THE STATION-HOUSE IN THE HASKELL - BARKER BUILDING TO THE LOOP ELEVATED STRUCTURE.

CDOT CHICAGO DEPARTMENT OF TRANSPORTATION

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WASHINGTON WABASH STATION

Existing Building Façade
Sheet 1

MAY 4, 2006

SCALE: 1" = 10'

DLK Civic Design

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CHICAGO DEPARTMENT OF TRANSPORTATION

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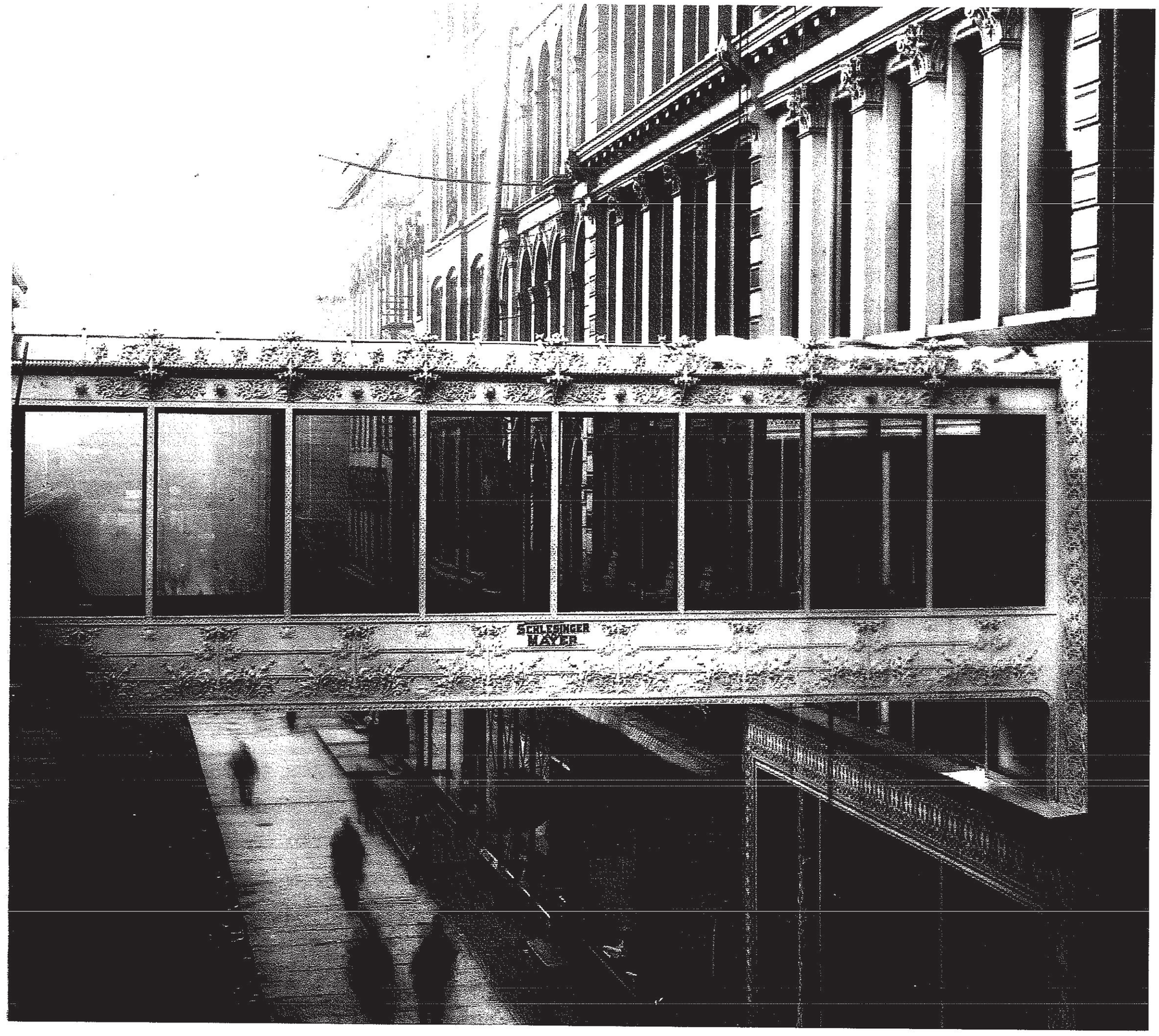
WASHINGTON WABASH STATION

Proposed Building Façade
Sheet 2

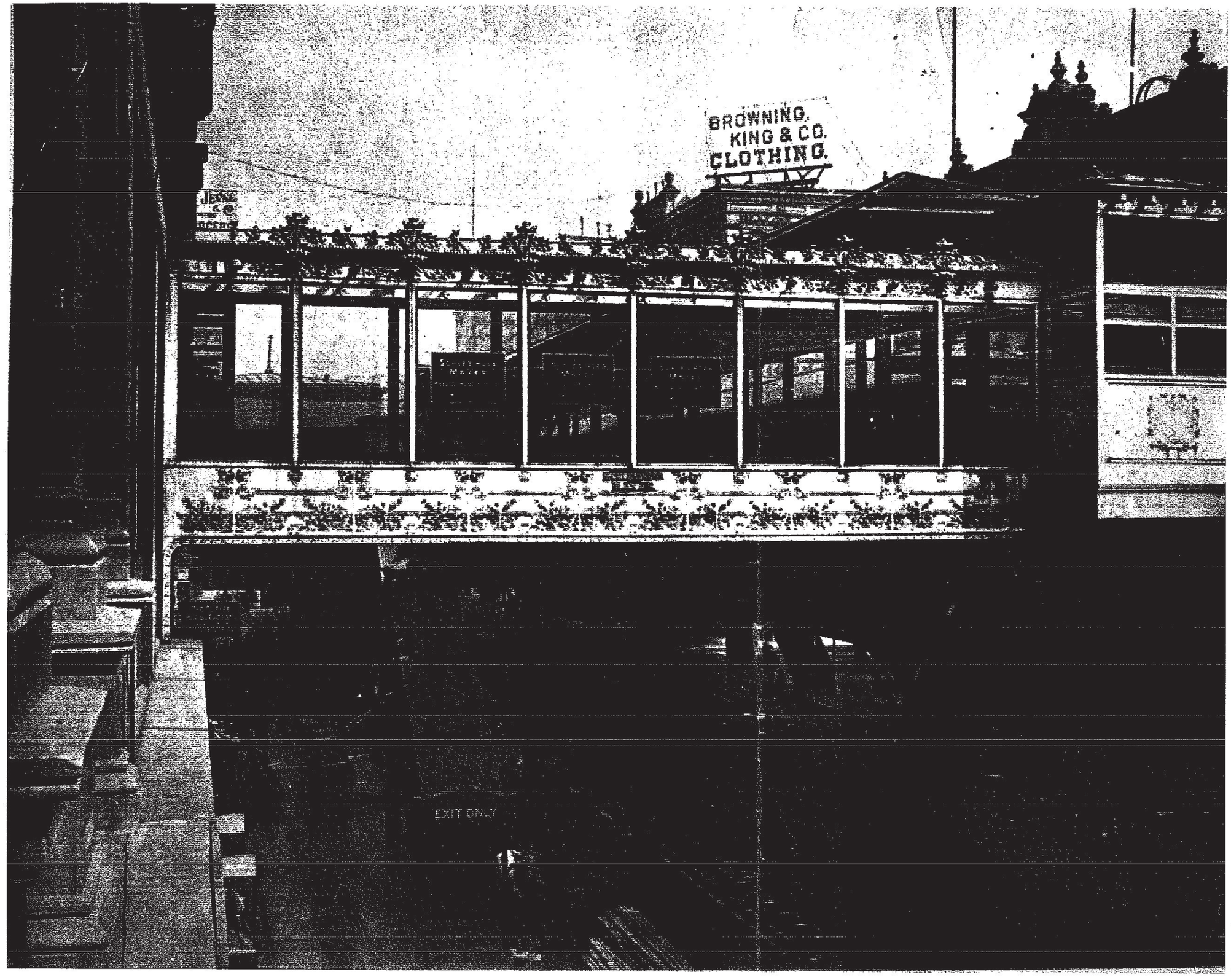
MAY 4, 2006

SCALE: 1" = 10'

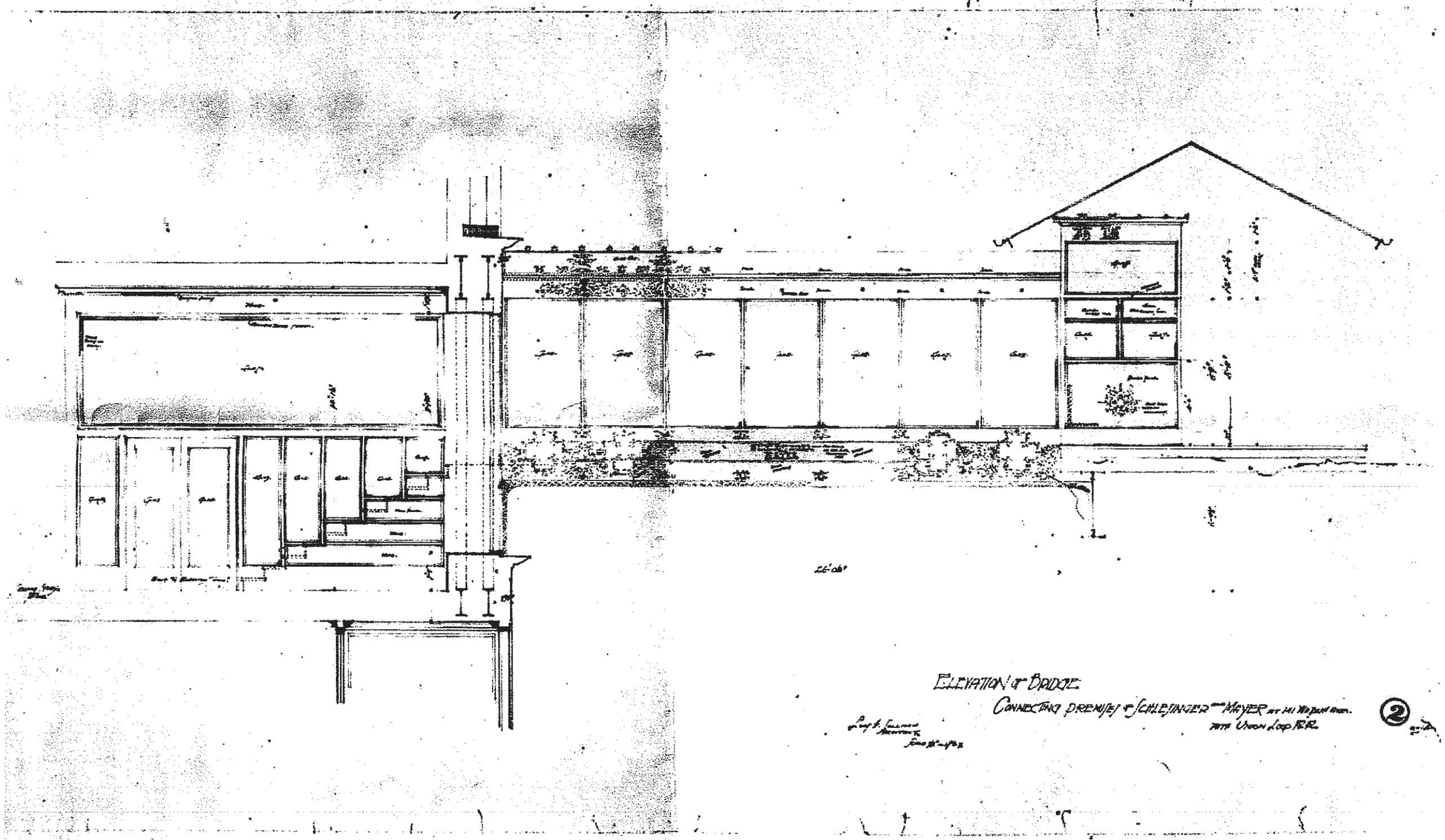
DLK
Civic Design



SCHLESINGER AND MAYER BRIDGE
NORTH FACADE
ARCHITECT: LOUIS SULLIVAN



SCHLESINGER AND MAYER
BRIDGE:SOUTH FACADE
ARCHITECT:LOUIS SULLIVAN



SCHLESINGER AND MAYER BRIDGE:ELEVATION ARCHITECT:LOUIS SULLIVAN

Appendix B

Historical Resources Correspondence, Attachments, and Research

- Section 106 Correspondence and Attachments
- HAER Correspondence Archives
- Excerpt from 1981 City of Chicago Master Plan for the Loop Elevated Rehabilitation and Historic Preservation
- National Register of Historic Places, HARGIS. and Chicago Landmarks Commission - Matrix

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Title

Section 106 Correspondence and Attachments
Urban Mass Transit Administration (UMTA) October 7, 1981 Finding of No Adverse Effect

Illinois Historic Preservation Agency
2006 Correspondence (May 3 by City, June 22 by SHPO)
2007 Correspondence (May 16 by City, Aug. 23 by SHPO)
2013 Correspondence (May 7 by FTA, Nov 5 by SHPO, Dec. 20 by FTA)

Historic American Engineering Records (National Park Service) Files

IL-1, IL-1D and IL-1I (ILL-16-CHIG-108, -108D, -108I)

Excerpt from 1981 City of Chicago *Master Plan for the Loop Elevated Rehabilitation and Historic Preservation*

National Historic Buildings and National and Chicago Landmarks

Section 106 Correspondence and Attachments

Urban Mass Transit Administration (UMTA)
October 7, 1981 Finding of No Adverse Effect

U.S. Department of Transportation
Urban Mass Transportation Administration

400 Seventh St., S.W.
Washington, D.C. 20590

CONCUR

OCT - 7 1981

ADVISORY COUNCIL
ON HISTORIC PRESERVATION

OCT - 7 1981

BY Joseph P. Houf
for Jordan E. Tannenbaum

Mr. Robert R. Garvey, Jr.
Executive Director
Advisory Council on Historic Preservation
1522 K Street, N.W.
Washington, D.C. 20005

Dear Mr. Garvey:

The City of Chicago and the Chicago Transit Authority propose to use financial assistance from the Urban Mass Transportation Administration (UMTA) to undertake the rehabilitation of the Loop Elevated Structure in Chicago, Illinois, a property eligible for the National Register of Historic Places. The project consists of upgrading the trestle and restoring, rehabilitating, and reconstructing certain stations to maintain the structural integrity of the facility and to respond to changing transportation needs in the Central Area of Chicago.

UMTA has determined that the proposed project as defined herein and in the City's Master Plan for the Loop Elevated Rehabilitation and Historic Preservation will have no adverse effect on the Loop Elevated Structure. Enclosed are the documentation for a determination of no adverse effect along with an attachment stating the conditions under which the Illinois State Historic Preservation Officer and the City concurred in this determination. These materials are submitted for your review and concurrence.

Sincerely,

Edward R. Fleischman

Edward R. Fleischman
Acting Director
Office of Program Analysis

Enclosures

cc: Ira Bach, City
Jerome Butler, DPW
Eugene Barnes, CTA
David Kenney, SHPO
Joel Ettinger, UMTA
Franz Gimmler, UMTA

URBAN MASS TRANSPORTATION ADMINISTRATION

DETERMINATION OF NO ADVERSE EFFECT

LOOP ELEVATED STRUCTURE REHABILITATION
CHICAGO, ILLINOIS

1. AGENCY INVOLVEMENT

The City of Chicago and the Chicago Transit Authority propose to use financial assistance from the Urban Mass Transportation Administration to rehabilitate the Loop Elevated Structure in the Central Area of Chicago.

2. DESCRIPTION OF THE PROPOSED UNDERTAKING

Rehabilitation will consist of a range of physical improvements designed to keep the Loop El structurally sound and respond to the changing transportation needs in the Central Area for the next 40 years. The rehabilitation will involve the trestle as well as the stations.

The trestle will remain on the same alignment on Lake Street, Wabash Avenue, VanBuren Street, and Wells Street. Support columns will remain at present locations and the height of the trestle will be maintained at or near the current elevation. Depending on the results of current inspection and testing, columns, girders, and stringers will be replaced as needed to maintain the structural integrity of the facility. Existing lattice-type track stringers may be replaced with new solid-web sections. All other repairs to the trestle will replace existing members in kind.

The rehabilitation plan includes eight stations on the Loop Elevated Structure. (There are nine existing stations.) Of the eight, two stations will be restored or rehabilitated in place and six stations will be newly constructed. The following gives a breakdown of the proposed station improvements:

The Quincy/Wells Station will be restored to its former condition to the greatest extent possible while maintaining current ridership levels and security standards.

The Wabash/Adams Station will be rehabilitated in place. To better serve existing passenger volumes, the mezzanine level of the station will be widened and glass canopies and barriers will be used to replace the existing metal.

The Washington-Madison/Wells Station will replace the existing Randolph/Wells and Madison/Wells stations. The new station entrances are placed at mid-block locations and the station would be incorporated in the Madison Plaza Building now under construction at the corner of Madison and Wells streets.

The LaSalle/VanBuren Station will be reconstructed at a mid-block location straddling Sherman Street. This will allow better station spacing from the proposed new Library Place Station and improve vertical access to the station.

The Library Place Station is a new station on the Loop El proposed near the intersection of VanBuren and State streets. The Library Place Station would have direct, enclosed access to the adjacent library building and would provide an easier transfer to the State Street subway.

The Washington-Madison/Wabash Station will replace the existing Randolph/Wabash and Madison/Wabash stations. Consolidation of these stations at one mid-block location will improve operating efficiency while maintaining easy transfer to bus, subway and commuter rail.

The State/Lake Station would be developed in either a new office structure built on the southwest corner of the intersection, or in the existing State and Lake Building if this structure is retained in North Loop development. Station platforms would be moved to the west to improve access.

The Clark/Lake Station would take advantage of joint development with the State of Illinois Center on the south side of Lake Street and the Transportation Center on the north side of Lake Street. Accessibility between the subway and the El would be improved with this relocated site. Integration with new development at this site will increase rapid transit ridership.

3. NATIONAL REGISTER-ELIGIBLE PROPERTIES AFFECTED BY THE UNDERTAKING

The Chicago Loop Elevated Structure is the only property on or eligible for the National Register which will be affected by this project. This is an elevated street railway facility located in the air rights of public right-of-way along Wells Street, VanBuren Street, Wabash Avenue, and Lake Street. Approximately two miles in length (11,200 linear feet), with nine passenger stations, it is owned and operated by the Chicago Transit Authority (CTA).

Property Description

The Loop Elevated Structure is a composite of structural steel and wood. The entire basic framework is steel, built up by the riveting together of plates and angles. The support columns and bents are formed "I" sections and are spaced at 30- to 50-foot intervals along the running sections. In Lake Street, Wells Street, and Wabash Avenue, the typical cross-section is 24 feet. This permits a two-lane roadway under the structure with parking lanes

between the columns and the curb. In VanBuren Street, the structure is 52 feet wide, curb to curb.

The longitudinal members are triangulated trusses of the same built-up composition and support the trackbed of creosoted wooden ties. The track fixation is standard, tie plate and spike, with the tie plates being placed directly on the flange angles capping the longitudinal members of the structure.

At the passenger stations the structure widens to accommodate the platforms, stairs, station agent booths, and other appurtenances. The typical platform width is eight feet at the extremities and twelve feet at the stairwell entries. Overall station width varies from about 40 to 60 feet.

The primary design principle was function, with little evidence of typical Late Victorian Period ornamentation. The stations are not architecturally uniform and reflect the individual company design decisions. Selectively upgraded by the Chicago Transit Authority to improve passenger comfort and safety, fiberglass, plexiglass, aluminum, Monel metal, and other modern materials have been used in the remodelings. The original steel frame and wooden decking remain otherwise unchanged.

Significance

In constant service since 1897, the Loop Elevated has been the cornerstone of rapid transit service in the Central Area of the city for over 80 years. Its presence and configuration traditionally defined the most prestigious locations for office buildings inside the steel girdle. It contributed to the definition of the downtown, the Chicago Loop. As the city grew, development went beyond its physical confines, leaving low-density marginal use corridors along the streets supporting the structure. Prestige locations were those a block or more away from the dirt and noise generated by the elevated rail operation.

The Loop El Structure is also significant as an example of riveted steel elevated transit construction. Elevated railways were built in large American cities in the late 19th and early 20th centuries to facilitate transport in densely populated urban areas and the Loop El is one of the earliest examples of this type of construction.

4. INAPPLICABILITY OF THE CRITERIA OF ADVERSE EFFECT

While the Loop El Structure has been the focus of elevated rail transit in Chicago since its construction, the noise and intrusiveness of the structure have been a continuing concern of city government. Since the construction of the subway lines in the downtown in the 1930s, the city's mass transit plans have included various proposals to replace the Loop El. More recently, the 1968

Chicago Central Area Transit Study had as one of its objectives the removal of the Loop El. The Central Area Transit Project emerged from this study and the City of Chicago identified the Franklin Line Subway Project as the highest priority and first increment of the overall Central Area Project. The Franklin Line Subway Project was proposed as a new north-south distributor link through the downtown which would have allowed the removal of two legs of the Loop El Structure. The city planned to follow with construction of the Monroe Line, an east-west subway which would have permitted the removal of the remaining two legs of the Loop El.

The Draft Environmental Impact Statement (July, 1978) for the Franklin Line Subway Project identified the Wells Street and VanBuren Street legs of the Loop El for removal as part of the subway project. A preliminary case report was submitted to the Advisory Council in November, 1978. This was followed by a public information meeting held in Chicago in January, 1979.

Because of the impact on the Loop El, local historic preservation groups opposed the Franklin Line Project. The project was also opposed locally because of the high cost and limited new transit service it provided. After a change in the city administration, local support for the project was withdrawn. The present plan to rehabilitate the Loop El was developed to accommodate historic preservation concerns while providing for the changing transportation needs in the Central Area over the next 40 years. A Determination of Effect for the rehabilitation project has to be made in the context of these historical developments.

A. Destruction or alteration of all or part of the property.

The Loop El Structure will be rehabilitated without changing the basic structure or function of the facility. The alignment will remain the same and support columns will stay at their present locations. On the trestle, existing lattice-type track stringers may be replaced with new solid-web sections, an improved design.

Of the nine existing stations, two will be restored or rehabilitated in place and seven will be removed. Six new stations will be constructed. Five of these stations will be built proximal to existing station locations. That is, the new station locations will be shifted slightly to take advantage of new joint development or mid-block entries. The sixth new station will be built at the southeast corner of the Loop El where a station was once located.

Station removal and reconstruction on the Loop El is not considered to be an adverse effect. Historically, it was not the stations but the encircling layout of the structure itself around the downtown core that embodied historical significance. As noted in the Department of the Interior's determination of eligibility for the National Register (July, 1978), the Loop El Structure is important as an historic transportation facility as well as for its

influence on the growth and development of downtown Chicago. As detailed in the City's Master Plan for the Loop El rehabilitation, original station locations have changed in some cases to adapt to changing needs. Stations have periodically been removed due to lack of ridership. Moreover, the fabric of the original stations has been altered through periodic maintenance over the years. In comparison, the trestle has remained relatively unchanged with its intricate web of supporting members still intact. The best hope, then, of preserving the Loop El as a viable transportation facility is to continue the trend of allowing stations to change in response to changing downtown developments.

B. Isolation from or alteration of the property's surrounding environment.

The project itself will not alter the surrounding environment. Certain stations would be integrated in buildings now under construction or planned to be constructed adjacent to the Loop El. In these joint development plans, the stations would generally be less obtrusive than they are now. Other new stations will utilize mid-block locations, thereby opening up the streetscape vistas which are presently blocked by the station houses.

C. Introduction of visual, audible, or atmospheric elements that are out of character with the property.

The new stations will be designed and constructed in accordance with the guidelines for new construction in the Secretary of the Interior's Standards for Rehabilitation. The designs for the new stations will be reviewed by the State Historic Preservation Officer to ensure that they are compatible with the Loop El Structure.

D. Neglect of a property resulting in its deterioration or destruction.

This project has been proposed specifically to upgrade the property so that it can continue to function efficiently at the heart of the city's rapid transit network.

E. Transfer or sale of a property without adequate conditions or restrictions regarding preservation, maintenance, or use.

The CTA owns the Loop El Structure. The property will not be transferred or sold as part of the proposed project.

5. VIEWS OF THE STATE HISTORIC PRESERVATION OFFICER

The Illinois State Historic Preservation Officer (SHPO) was consulted regarding his views on a determination of effect for the Loop El Rehabilitation Project. With certain conditions accepted by all parties, the SHPO concurs in the

determination of no adverse effect. These conditions, with the signatures of the concurring parties, are attached to this determination.

6. ESTIMATED COST OF THE UNDERTAKING

The estimated total cost of the proposed Loop El rehabilitation is approximately $100 million, with the proposed Federal share being $80 million.

7. DETERMINATION

The Urban Mass Transportation Administration has determined in consultation with the Illinois State Historic Preservation Officer that the proposed rehabilitation project will not adversely affect the Chicago Loop Elevated Structure.

October 7, 1981
Date

Edward R. Fleischman
Acting Director
Office of Program Analysis

CONDITIONS FOR A DETERMINATION OF NO ADVERSE EFFECT FOR THE CHICAGO LOOP ELEVATED REHABILITATION PROJECT

1. The location and structural characteristics of the Loop Elevated Structure (trestle) shall remain substantially unchanged as a result of the Loop Elevated Rehabilitation Project and shall continue to function as a transportation facility. All structural elements of the trestle will continue to be tested for structural integrity and replaced, if necessary. New structural elements may be added or existing ones replaced or removed for safety or operational reasons.

2. The rails, signals, electrical systems, amenities (e.g., drip-pans) or components thereof may be improved or replaced, as necessary, at the discretion of the CTA or the City of Chicago for the purpose of improving operational efficiency, safety, reducing noise or enhancing the amenities of the structure to the passengers, pedestrians or motorists.

3. The City of Chicago and the CTA shall restore the Quincy/Wells station to a condition as close as possible to its condition of the early 1900's. This project shall be undertaken in accordance with the recommended approaches in the Secretary of the Interior's Standards for Rehabilitation.

4. The City of Chicago and the CTA agree to rehabilitate the Adams/Wabash station to emphasize the historic structural characteristics of the trestle. In returning this station to a state of utility through use of contemporary materials and design elements, this project shall be undertaken in accordance with the recommended approaches in the Secretary of the Interior's Standards for Rehabilitation.

5. With the exception of Quincy/Wells and Wabash/Adams, all other existing stations on the Loop Elevated Structure may be removed in accordance with the Master Plan. Prior to the demolition of any structure, the City of Chicago and/or the CTA shall first contact the National Architectural and Engineering Record (NAER) (National Park Service, U.S. Department of the Interior) to determine the level of documentation required. All documentation must be accepted by NAER, and the Advisory Council on Historic Preservation must be notified of the acceptance prior to demolition. Copies of the documentation required will be stored in the archives of the CTA, the Municipal Reference Library and the Chicago Historical Society, and submitted to the National Architectural and Engineering Record. The cost of these historical records will be part of the cost of the station construction funded by UMTA. Selected copies of these records may also be displayed in the new stations as appropriate.

CONDITIONS FOR A DETERMINATION OF
NO ADVERSE EFFECT FOR THE CHICAGO LOOP ELEVATED
REHABILITATION PROJECT

6. As defined in the Master Plan, new stations may be constructed at mid-block locations in such a manner as to take advantage of adjacent buildings as a source of space for stations. The new structures shall be designed in accordance with the Secretary of the Interior's Standards for Rehabilitation.

7. The Illinois State Historic Preservation Officer will be given the opportunity to review final design plans for the restoration, rehabilitation and new construction of stations on the Loop Elevated Structure prior to the implementation of such improvements.

8. In the event that any of the involved parties determines that the aforementioned conditions cannot be met or must be modified, the Illinois State Historic Preservation Officer and the federal Advisory Council On Historic Preservation shall be consulted and the involved parties upon agreement may for good cause modify or amend these conditions.

Commissioner, Department of Public Works (date) 10-2-81
The City of Chicago

Chairman (date) 10/2/81
Chicago Transit Authority (CTA)

Illinois State Historic Preservation Officer (Illinois SHPO) (date) 10/5/81

Section 106 Correspondence and Attachments

Correspondence with Illinois Historic Preservation Agency
2006 Correspondence (May 3 by City, June 22 by SHPO)
2007 Correspondence (May 16 by City, August 23 by SHPO)
2013 Correspondence (May 7 by FTA, November 5 by SHPO, December 20 by FTA)

City of Chicago
Richard M. Daley, Mayor

Department of Transportation

30 North LaSalle Street
Suite 1100
Chicago, Illinois 60602-2570
(312) 744-3600
www.cityofchicago.org/transportation

May 03, 2006

Ms. Ann Haaker
Deputy State Preservation Officer
Preservation Services
#1 Old State Capitol Plaza
Springfield, IL 62701-1507

Subject: **Haskell Building**
CDOT Project D-3-102
Reuse as Stationhouse for a new CTA Elevated Station

Dear Ms. Haaker:

I am writing in regards to the reuse of the historic Haskell building (of the Haskell-Barker-Atwater buildings) as the stationhouse for a new elevated CTA station.

Background

Applicable Historic Designations:

- Haskell-Barker-Atwater buildings – Chicago Landmark, designated 11/13/96
- Jewelers Row District – Chicago Landmark, designated 7/9/03
- Loop Retail Historic District – National Park Service National Register of Historic Places, listed 11/27/98

From the Jewelers Row District Landmark Designation Report:

The Haskell and Barker buildings, built in 1875, are fine examples of the small-scale commercial loft buildings, the oldest building type in the district, built just after the fire of 1871.

From the Haskell-Barker-Atwater buildings Chicago Landmark designation:

Clad in stone and detailed in classical ornament, the lower two floors of the northernmost building were remodeled in 1896 by architect Louis Sullivan. Those changes demonstrate his distinctive ornamental style and approach to modern architecture.

In the National Register of Historic Places Loop Retail Historic District listing, the Haskell-Barker-Atwater buildings are listed as a contributing structure. It also notes the Sullivan renovation of 1896, and shortly after, a bridge, which was demolished.

Current conditions

The overall configuration and many decorative pieces of the Sullivan renovation remain. The first floor Sullivan-designed ledge that topped the original but missing flat decorative frieze panel remains. The overall configuration of the first floor appears to have changed little from the Sullivan renovation although the decorative panels have been removed and the glazing has changed. The current first floor pilasters and fascia is covered with plain flat sheet metal panels with simple detailing.

The second floor is in better shape, with the decorative panels and decorative ledge intact but deteriorated. A blank-out panel with mechanical louver covers the location of the original Sullivan-designed footbridge. A fire escape obscures portions of the southern section of the second floor with attachment through the Sullivan decorative panels.

The Sullivan decorative metalwork that remains is rusting, deteriorated and covered with a heavy layer of paint.

The third and fourth floors of the Haskell building as well as the façades of the Barker and Atwater buildings appear to be in fair condition with most original detailing intact. All exterior glazing, except for the first floor storefront's lower windows, is opaque (either painted glass or metal panel) and has numerous mechanical louvers. The façades are covered in heavy paint.

Current proposal

The CTA wishes to replace two existing elevated stations, Randolph and Monroe, with a single new station. The existing stations are at the end of their useful lives and do not fully meet current CTA and ADA design standards. The Haskell building location would give the CTA an opportunity to have a key transfer point between the Red Line Subway on State Street and the Orange/Brown/Yellow/Purple Elevated Lines above Wabash Avenue. The new station will provide CTA customers with full ADA accessibility, meet the current design standards of CTA stations (access, customer amenities, weather protection), and provide the increased capacity needed for continued growth and support of the region's transportation needs. Operation and maintenance costs will be reduced which will benefit the overall CTA budget.

With the consolidation of the stations into one new station, the public will benefit from better station access and a faster trip through the loop. The Wabash streetscape will benefit from more light and less congestion. View corridors down Randolph and Madison Streets will provide a clearer view to Millennium Park with the removal of stationhouses located over the intersections. Street clearances will be improved at the Randolph and Madison intersections. The new station would also relocate large elements

such as escalators, stairs and an elevator that would otherwise restrict circulation at sidewalks and obstruct views of building façades.

The new stationhouse functions will be located within the first and second floor space of the Haskell building, which will contain an entry at street level, a mezzanine level and a platform level, all connected with an interior elevator, escalators and stairs. A two-level footbridge will connect the stationhouse mezzanine level to the outer loop platform and the stationhouse platform level directly to the inner-loop platform. The footbridge width will be sized to meet existing code-required exiting capacity.

The upper level of the footbridge will closely match the original elevation and height of the demolished Sullivan bridge. The mezzanine level of the footbridge will pass through the existing fascia separating the first and second levels of the façade. The existing Sullivan details will be restored and missing decorative panels will be recreated and installed on the first floor. The glazing for the two-story façade will be restored to all vision glass.

For proper station access and to meet capacity needs, the bridge is required to be two-stories. The desire is to have the bridge appear as a light structure to minimize its presence on the street. The new stationhouse will be framed by a restored Sullivan façade. The new design for the station will acknowledge the Sullivan design while remaining a light, modern facility.

We are requesting that the two story bridge be allowed. As this project is in the early stages of development, we look forward to discussing this project with you to arrive at a design that satisfies all parties.

Per my May 03, 2006, telephone conversation with Ms. Carol Dyson, we have attached our Loop Master Plan, pictures and plans related to the project. Should you have any questions or require additional information, please contact Thomas P. Ambry of my staff at 312 744-7742.

Sincerely,

Bob Loomis, P.E.
Deputy Commissioner

Cc:
Ambry
Flores
B. Goeken (DPD/L)
K. Cook (DPD)
File

Attachments (IHPA)

Illinois Historic
Preservation Agency

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www.illinois-history.gov

Cook County
Chicago
Rehabilitation for Reuse as Stationhouse, Haskell Building
18-20 S. Wabash Ave.
IHPA Log #003050906

June 22, 2006

Robert Loomis
City of Chicago
Department of Transportation
30 N. LaSalle St., Suite 1100
Chicago, IL 60602-2570

Dear Mr. Loomis:

Thank you for arranging the staff site inspection at 18-20 South Wabash, the Haskell Building, which is proposed for adaptive use as a stationhouse for a new CTA Elevated Station. It was most helpful when we looked at the schematic drawings. The proposal would partially demolish and wholly obscure a façade designed by Louis Sullivan I n1896. It would also require wholesale interior demolition of the Haskell Building for elevators, escalators, turnstyles, etc.

Further, the project is located in the Loop Retail Historic District. Since the project would entail a large station and platform, it would further obscure several historic buildings across the street, most notably the Jewelers' Building, which is also a Louis Sullivan design.

It is our decision that these are very grave adverse effects and we encourage the CTA to explore alternative locations for the Wabash Elevated Station. Thank you for this opportunity to comment. We look forward to working with you as the project progresses.

Sincerely,

Anne E. Haaker

Anne E. Haaker
Deputy State Historic
Preservation Officer

Cc: Tom Ambry, Chicago Dept. of Transportation
Eleanor Gorski, City of Chicago, Dept. of Planning and Development

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